

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROYCE CORLEY,

Plaintiff,

15 Civ. 9621  
(Failla, J.)

v.

HON. BONNIE G. WITTNER, et al.,

Defendants.

DECLARATION

DECLARATION OF ROYCE CORLEY

STATE OF VIRGINIA            )  
  > s.s.:  
COUNTY OF PRINCE GEORGE )

Plaintiff ROYCE CORLEY, declares under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Royce Corley. I am over 18 years of age. I am fully competent to make this declaration, and I have personal knowledge of the facts stated in this declaration. To my knowledge, all of the facts stated in this declaration are believed to be true and correct.

2. I am the sole Plaintiff in this action proceeding pro se. I make this declaration in opposition to the Defendants' motions to dismiss, and in support of Plaintiff's cross-motions to enter default, partial judgment on the pleadings, leave to take discovery and to amend the complaint (if necessary).

ANNEXED EXHIBITS

3. A true and correct copy of the signed and sealed CERTIFICATE OF DISPOSITION DISMISSAL in the matter of People v. Royce Corley, Case No. 00423-2012 (N.Y. Ct. Sup. Ct.) is annexed hereto as Plaintiff's Exhibit "A."

4. A true and correct copy of a letter from the Supreme Court of the State of New York, Appellate Division--1st Dep't In Re People v. Nathaniel Jackson, Case No. 04157-2011 (dated Sep. 24, 2014) is annexed as Plaintiff's Exhibit "B."

5. A true and correct copy of a reproduced Affidavit of Herbert L. Rogers In Re People v. Ricardo Kimble, Case No. 03621-1999 (dated May 4, 2004) is annexed hereto as Plaintiff Exhibit "C."

6. A true and correct copy of "Demographics of all Arrests for Prostitution in the County of New York (1990-2015)" from the N.Y.S. Division of Criminal Justice Services (dated Aug. 17, 2016) is annexed as Plaintiff's Exhibit "D-1."

7. A true and correct copy of "Demographics of all Convictions for Prostitution in the County of New York (1990-2015)" from the N.Y.S. Div. of Crim. Jus. Servs. (dated Nov. 1, 2016) is annexed as Plaintiff's Exhibit "D-2."

8. A true and correct copy of excerpts from the book entitled "Call Girl Confidential: An Escort's Secret Life as an Undercover Agent" by Rebecca Kade (c) 2014 (pgs. 98-111, 136-139, 164-173) is annexed as Plaintiff's Exhibit "E."

9. A true and correct copy of a letter from Glenn F. Hardy, Esq. to the Nassau County Bar Association, Committee on Grievances, File #N-1902-14 (dated Oct. 8, 2014) is annexed hereto as Plaintiff's Exhibit "F."

10. A true and correct copy of an "NYC Assigned Counsel Plan--Expert Voucher for 722-c Services" with supporting records (dated Nov. 20, 2013) is annexed hereto as Plaintiff's Exhibit "G."

11. A true and correct copy of a N.Y. Daily News article entitled "Lawyer: Brooklyn district attorney's office dropping problem-plagued case of four men charged in rape of Orthodox Jewish woman" by Oren Yaniv, et al. (dated Jun. 21, 2012) is annexed hereto as Plaintiff's Exhibit "H-1."

12. A true and correct copy of a PIX-11 article entitled "FIRST ON PIX: Alleged pimp brands his prostitutes with tattoos ..." by Mario Diaz, et al. (dated Dec. 19, 2012) is annexed hereto as Plaintiff's Exhibit "H-2."

13. A true and correct copy of a N.Y. Post article entitled "Sex-trap twin gets slammer" by Rebecca Rosenberg (date unknown) is annexed hereto as Plaintiff's Exhibit "I."

14. A true and correct copy of a Gotham Gazette article entitled "New York Must Strengthen Sex Trafficking Laws" by Cyrus Vance, Jr. (dated Jan. 28, 2015) is annexed hereto as Plaintiff's Exhibit "J-1."

15. A true and correct copy of a N.Y. Post article entitled "'Cuffs' On Prosecutors" by Yoav Gonen, et al. (dated Apr. 18, 2018) is annexed hereto as Plaintiff's Exhibit "J-2."

16. A true and correct copy of a N.Y. Daily News article entitled "Pimp a less-fit dad than 3-year-old's hooker mom" by Janon Fisher (dated Aug. 1, 2012) is annexed hereto as Plaintiff's Exhibit "J-3."

17. A true and correct copy of District Attorney Press Release entitled "DA VANCE: SEX TRAFFICKER SENTENCED TO 10-2/3-TO-32 YEARS IN PRISON" by Cyrus R. Vance, Jr. (dated Feb. 5, 2014) is annexed hereto as Plaintiff's Exhibit "J-4."

EXHIBITS INCORPORATED BY REFERENCE

(the following exhibits are in the possession of the U.S. Attorney and Plaintiff has no means to disseminate these records in electronic form)

18. A true and correct description of "Investigation Bureau Follow-up Reports" by DANY indicating investigation of Royce Corley between August 2011 and January 2012 (Bates US 000002-000009) is incorporated by reference as Plaintiff's Exhibit "K-1."

19. A true and correct description of an "e-Justice NY Background Search" of Royce Corley by John Temple dated Sep. 8, 2011 (Bates US 000010-000012) is incorporated by reference as Plaintiff's Exhibit "K-2."

20. A true and correct description of a "LexisNexis® Background Search" of Royce Corley, circa 2010 (Bates US 000013-000036) is incorporated by reference as Plaintiff's Exhibit "K-3."

STATEMENTS PURSUANT TO RULE 56(d)

21. The foregoing statements are made in support of Plaintiff's cross-motion to take discovery and to deny any motion construed as summary judgment pursuant to Fed. R. Civ. P. 56(d)--

22. Plaintiff seeks the following facts from discovery with respect to each of the following claims to prevail on summary judgment or at trial (these facts below should be considered in aggregation):

COUNT I  
(Privacy)

- (a) Records of all court orders issued by Judge Wittner before the Grand Jury gave her jurisdiction on February 15, 2012, pursuant to N.Y. Crim. Proc. Law § 10.20(2);
- (b) Records of all evidence obtained by DANY and the legal authority used to obtain them;
- (c) Transcripts, docket entries and other records from all cases that were used to obtain Corley's records, e.g., People v. Jackson, Brito, et al.;
- (d) Testimony from Judge Wittner and DANY about the role they played in obtaining Corley's records and explaining how they had jurisdiction;

COUNT II  
(Outrageous Government Conduct)

- (e) Testimony and prior statements from E.S.W. a/k/a "Minna" about her interactions with Judge Wittner, DANY and other law enforcement agencies;
- (f) Testimony and prior statements from J.M.L. a/k/a "Phebe" about her interactions with Minna, DANY and other law enforcement (specifically, she intimated to Corley that she learned that Minna was "working for a Judge and Prosecutor;";
- (g) Investigative file from DANY, NYPD and other law enforcement regarding Corley's case and other;
- (h) Testimony from DANY about their investigative technique of compelling prostitutes to work as informants, e.g., Rebecca Kade, Minna, etc.;

COUNT III  
(Speedy Trial)

- (i) Records and testimony from Glenn F. Hardy and why he failed to preserve and assert Corley's speedy trial rights;
- (j) Records and testimony from DANY and why it took over a year to dismiss a simple prostitution case against Corley;
- (k) Records and testimony from prior clients of Glenn F. Hardy and Michael J. Barry that complained of speedy trial violations, leaks to the media, etc.

COUNT IV  
(Obstruction of Justice)

(l) Records and testimony from Michael J. Barry on what investigative work he accomplished for Corley, his relationship with the media, his phone and e-mail records with the media and Mr. Hardy;

(m) Records from the N.Y.S. Div. of Crim. Justice Svcs., U.S. Attorney and DANY about the disposition and demographics of all cases forwarded for federal prosecution;

(n) Records and testimony from Glenn F. Hardy, Michael J. Barry, and their former clients regarding racial prejudice and bias;

COUNT V  
(Equal Protection)

(o) Records from the N.Y.S. Div. of Crim. Justice Svcs. and DANY regarding the dispositions of prostitution cases distinguished by victim's race;

(p) Records from the N.Y.S. Unified Court System, Judge Wittner, and former defendants before her, regarding the disposition of Black defendants versus other races;

COUNT VI-X  
(NIED, Malpractice, Unjust Enrichment,  
Fraud and Deceptive Business Practices)

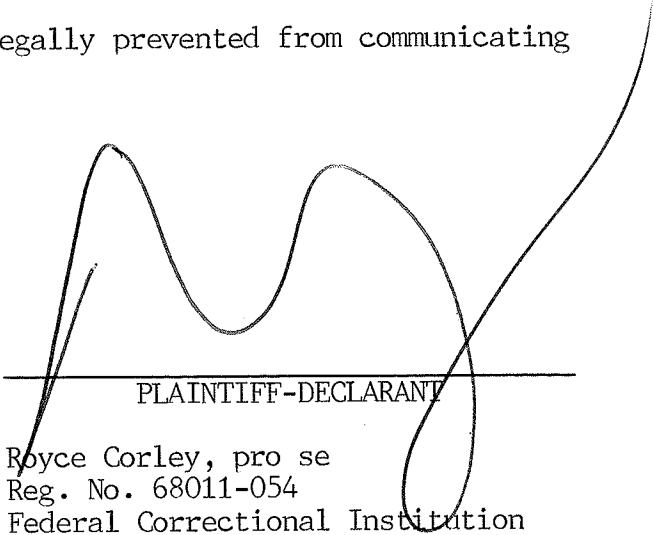
(q) Records and testimony from the prior clients of Glenn F. Hardy and Michael J. Barry, whose cases were reported by the media;

23. All of the foregoing facts would present a genuine issue of material fact about the (a) motivations for each of the Defendants' actions, (b) racial prejudice and bias, (c) outrageous government conduct, (d) financial gain from their actions, (e) invasion of Corley's privacy, (f) deliberate violation of Corley's constitutional rights, (g) Corley's extended incarceration, etc.

24. The Court should be mindful that this is the pleading stage of the case in which the Complain MUST be construed to be true. Plaintiff has had some success with obtaining records through the Freedom of Information Laws. Plaintiff has also requested records directly from Mr. Hardy and Mr. Barry.

25. Plaintiff has been mostly unsuccessful in obtaining a majority of the aforementioned facts because the Defendants have refused to volunteer information, the State and Federal authorities have refused to honor their respective Freedom of Information laws, the State Court has sealed many records from public view, and because of fraud committed by the Defendants and the Federal Government. Furthermore, because Minna and Phebe were considered victims in Plaintiff's federal case, he is legally prevented from communicating with them to obtain their testimony.

Dated: November 18, 2018  
Petersburg, VA



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PLAINTIFF-DECLARANT

Royce Corley, pro se  
Reg. No. 68011-054  
Federal Correctional Institution  
P.O. Box 1000  
Petersburg, VA 23804-1000  
68011054@imail.klolk.com

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
NEW YORK COUNTY  
100 CENTRE STREET  
NEW YORK, NY 10013

FEE:\$10.00

CERTIFICATE OF DISPOSITION DISMISSAL

DATE: 02/26/2015

CERTIFICATE OF DISPOSITION NUMBER: 49857

PEOPLE OF THE STATE OF NEW YORK  
VS.

CASE NUMBER: 00423-2012  
LOWER COURT NUMBER(S): 2012NY007628  
DATE OF ARREST: 01/25/2012  
ARREST #: M12607660  
DATE OF BIRTH: 06/26/1984  
DATE FILED: 01/26/2012

CORLEY, ROYCE L

DEFENDANT

I HEREBY CERTIFY THAT IT APPEARS FROM AN EXAMINATION OF THE RECORDS ON FILE IN THIS OFFICE THAT ON 02/01/2013 THE ABOVE ACTION WAS DISMISSED AND ALL PENDING CRIMINAL CHARGES RELATED TO THIS ACTION WERE ALSO DISMISSED BY THE HONORABLE WITTNER, B THEN A JUDGE OF THIS COURT.

THE DEFENDANT WAS DISCHARGED FROM THE JURISDICTION OF THE COURT.

THE ABOVE MENTIONED DISMISSAL IS A TERMINATION OF THE CRIMINAL ACTION IN FAVOR OF THE ACCUSED AND PURSUANT TO SECTION 160.60 OF THE CRIMINAL PROCEDURE LAW "THE ARREST AND PROSECUTION SHALL BE DEEMED A NULLITY AND THE ACCUSED SHALL BE RESTORED, IN CONTEMPLATION OF LAW, TO THE STATUS OCCUPIED BEFORE THE ARREST AND PROSECUTION".

PURSUANT TO SECTION 160.50(1C) OF THE CRIMINAL PROCEDURE LAW, ALL OFFICIAL RECORDS AND PAPERS RELATING TO THIS CASE ARE SEALED.

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND AFFIXED MY OFFICIAL SEAL ON THIS DATE 02/26/2015.



COURT CLERK



**E X H I B I T    B**

Supreme Court of the State of New York  
Appellate Division - First Department  
27 Madison Avenue  
New York, N.Y. 10010  
(212) 340-0400

September 24, 2014

Royce Corley(68011-054)  
Federal Correctional Institution  
33 ½ Pembroke Road  
Danbury, CT 06811-3099

Re: People v. Nathaniel Jackson  
Ind. #4157/11 & 34/12, New York

Dear Mr. Corley:

This is to acknowledge receipt of your correspondence dated September 1, 2014, requesting a copy of transcripts of the above-listed defendant.

Please be advised that the transcripts you seek are not available for public viewing.

Yours truly,

Clerk's Office

**E X H I B I T   C**

Kimble v. Brown, 05 Civ. 8161 (SHS)(DFE), 2008 U.S. Dist. LEXIS 90983  
(S.D.N.Y., Jul. 25, 2008):

Affidavit in support of 440 motion; filed upon the Supreme Court of the State of New York: By  
Ricardo Kimble Indictment number 3621/99

State of New York)

County of Orange ) ss.:

Herbert L. Rogers being duly sworn, desposes and says:

I am the Co-defendant of Ricardo Kimble In. No. 3621/99.

Ricardo and I were arrested on January 10, 1999., and while he participated i a jury trial, I struck a  
plea bargain and received a sentence of 9 years to life.

At no time did I make an agreement with a prosecutor, a Judge or anyone else that as a condition of  
my plea bargain I would not testify for Ricardo.

Nevertheless, on more than one occasion Judge **Bonnie Wittner** repeatedly threatened this affiant  
with federal prosecution in the event I should testify for Mr. Kimble.

As a result of those threats and others regarding the vacature of my plea agreement I did not testify.

It is my firm belief taht the outcome of Mr. Kimbles' trial would have been more favorable to him if  
the Jury had heard my testimony, particularly, but not limited to the facts that Mr. Kimble never saw  
any drugs, never saw any money, was not present when the drugs were purchased, never knew how  
much money I had in my possession, nor how much drugs I intended to purchase. I repeatedly tried  
to tell tha court all of the above facts but the Judge made it clear that she would not accept my plea  
unless I stated the facts in a way that was acceptable to the court. In light of te forgiong I dont  
believe Mr. Kimble received a fair trial.

/s/ Herbert L. Rogers

Herbert L. Rogers, 00A5604

SWORN TO BefoRe Me This

4 DAY of May 2004

**E X H I B I T   D-1**



Division of Criminal  
Justice Services

August 17, 2016

Mr. Royce Corley  
Reg. No. 68011-054  
Federal Correctional Institution  
33 ½ Pembroke Road  
Danbury, CT 06811-3099

Dear Mr. Corley:

This will acknowledge receipt of your Freedom of Information Law ("FOIL") request, received by the Division of Criminal Justice Services ("Division") requesting copies of all records in our agencies "Computerized Criminal History System" from the years 1990 through 2015, regarding the following:

- Demographics (by age, gender, race-ethnicity) of all arrest for Prostitution Offenses (Penal Law art. 230) in the County of New York ("Manhattan"), organized by the "Top Arrest Charge";
- Demographics (by age, gender, race-ethnicity) of all arrest for Sexual Offenses (Penal Law art. 130) in the County of New York ("Manhattan"), organized by the "Top Arrest Charge".

Enclosed is the data that is responsive to your request.

Pursuant to Public Officers Law §89(4)(a), you may appeal this determination to the Counsel, Division of Criminal Justice Services, 80 South Swan St., Albany, NY 12210.

Very truly yours,

A handwritten signature in black ink, appearing to read "Valerie Friedlander".

Valerie Friedlander  
Records Access Officer

Enclosure

# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge PL 230.00 PROSTITUTION	Year	Total Arrests	Age Group:										Gender:			Race-Ethnicity:				
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
1990	1322	0	160	446	452	158	84	18	0	4	0	0	59	1260	3	675	408	186	53	0
1991	615	0	44	163	170	134	66	28	8	2	0	0	53	561	1	269	144	148	54	0
1992	482	0	40	101	122	127	68	16	7	1	0	0	116	366	0	142	101	161	78	0
1993	576	0	46	116	177	112	84	25	6	10	0	0	163	413	0	183	125	191	76	1
1994	777	0	61	191	226	158	90	35	9	7	0	0	251	526	0	193	218	181	185	0
1995	602	0	47	126	163	132	95	28	6	5	0	0	134	466	2	140	125	197	140	0
1996	869	0	65	173	225	196	112	56	30	12	0	0	168	700	1	186	187	280	216	0
1997	705	0	88	116	179	140	98	48	28	8	0	0	124	578	3	182	206	190	127	0
1998	1004	0	138	249	193	174	142	70	16	22	0	0	188	816	0	269	297	308	130	0
1999	1020	0	114	258	222	186	136	67	22	15	0	0	209	807	4	200	228	388	204	0
2000	1206	0	207	299	232	201	136	75	37	19	0	0	317	887	2	269	375	415	147	0
2001	1246	0	251	287	253	200	135	84	27	9	0	0	361	883	2	227	433	448	138	0
2002	1472	0	312	348	261	195	168	119	52	17	0	0	426	1046	0	296	640	419	113	4
2003	955	0	230	213	181	134	101	52	29	15	0	0	334	621	0	164	377	320	89	5
2004	875	0	197	182	181	127	91	63	20	14	0	0	301	574	0	149	365	237	115	9
2005	1004	0	179	160	212	148	151	88	39	27	0	0	258	746	0	164	345	213	276	6
2006	491	0	111	104	79	77	54	44	13	9	0	0	158	333	0	77	178	126	99	11
2007	482	0	68	98	81	79	72	46	29	9	0	0	83	399	0	70	120	116	174	2
2008	511	0	61	79	81	90	73	55	39	33	0	0	162	349	0	77	138	135	158	3
2009	329	0	37	54	63	48	51	29	29	18	0	0	61	268	0	54	97	65	108	5
2010	228	0	37	55	42	34	27	12	12	9	0	0	42	186	0	33	93	39	60	3
2011	231	0	32	48	45	25	29	29	14	9	0	0	68	163	0	41	89	30	66	5
2012	311	0	26	75	49	35	34	37	36	19	0	0	52	259	0	64	99	64	78	6
2013	326	0	38	49	66	51	38	34	29	21	0	0	53	273	0	80	78	68	93	7
2014	523	0	59	123	106	72	51	50	27	35	0	0	47	476	0	129	150	95	147	2
2015	386	0	36	74	83	66	47	27	27	26	0	0	44	342	0	85	121	71	102	7

# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge	Year	Total Arrests	Age Group:										Gender:			Race-Ethnicity:				
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
PL 230.03 PATRONIZE PROSTITUTE-4 (Note: This charge was repealed in 2007 then replaced in 2011 with 'Prostitution in a School Zone' but no arrests have been reported for that charge from New York County)	1990	80	0	14	15	25	13	9	3	1	0	0	80	0	0	48	21	7	4	0
	1991	90	0	12	23	17	13	13	4	6	2	0	89	1	0	56	17	5	12	0
	1992	97	0	3	12	15	20	19	13	7	8	0	96	1	0	58	10	18	11	0
	1993	230	0	11	44	58	45	27	17	15	13	0	228	2	0	128	43	36	23	0
	1994	932	0	53	149	213	197	123	94	50	53	0	927	5	0	547	171	124	90	0
	1995	539	0	24	56	141	105	87	52	36	38	0	537	2	0	233	135	86	85	0
	1996	560	0	39	52	117	114	105	65	33	35	0	550	9	1	243	158	109	50	0
	1997	553	0	30	59	107	109	99	46	48	55	0	538	15	0	252	169	90	42	0
	1998	480	0	20	48	93	107	78	54	33	47	0	477	3	0	232	99	113	36	0
	1999	439	0	22	33	81	82	75	70	27	49	0	439	0	0	203	151	68	17	0
	2000	339	0	12	31	56	61	62	45	34	38	0	338	1	0	155	97	69	18	0
	2001	291	0	11	39	45	55	45	44	23	29	0	291	0	0	123	79	72	17	0
2002	412	0	32	40	75	69	80	49	36	31	0	410	2	0	159	121	94	35	3	
2003	358	0	12	44	60	61	63	47	25	46	0	353	5	0	118	126	72	22	20	
2004	408	0	27	50	56	77	71	57	34	36	0	408	0	0	101	128	123	18	38	
2005	487	0	26	50	69	87	76	81	50	48	0	481	6	0	83	215	129	29	31	
2006	224	0	12	32	44	33	26	35	19	23	0	223	1	0	60	83	50	11	20	
2007	196	0	6	37	30	28	26	27	20	22	0	196	0	0	58	43	70	16	9	



# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge	Year	Total Arrests	Age Group:								Gender:			Race-Ethnicity:							
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.	
PL 230.04 PATRONIZE A PROSTITUTE-3RD	1990	9	0	0	2	2	1	2	0	0	2	0	9	0	0	5	3	1	0	0	
	1991	7	0	0	0	3	1	1	0	1	1	0	7	0	0	0	1	4	2	0	
	1992	9	0	0	3	0	4	0	1	0	1	0	9	0	0	2	2	5	0	0	
	1993	18	0	0	1	8	5	4	0	0	0	0	18	0	0	4	7	5	2	0	
	1994	19	0	1	2	8	1	4	2	1	0	0	19	0	0	5	0	10	4	0	
	1995	8	0	1	0	1	2	2	2	0	0	0	8	0	0	5	0	1	2	0	
	1996	7	0	1	1	1	1	1	1	0	1	0	7	0	0	5	1	1	0	0	
	1997	3	0	0	0	1	0	1	0	0	1	0	3	0	0	2	0	1	0	0	
	1998	5	0	0	0	0	0	0	1	1	3	0	5	0	0	4	1	0	0	0	
	1999	7	0	0	1	0	1	2	2	1	0	0	7	0	0	4	2	1	0	0	
	2001	1	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	1	0	
	2002	5	0	0	0	1	1	1	0	1	1	0	5	0	0	0	4	0	0	1	
	2003	11	0	0	0	2	1	0	1	1	4	3	0	11	0	0	0	10	1	0	0
	2004	4	0	0	0	1	0	0	0	0	2	1	0	4	0	0	1	3	0	0	0
	2005	4	0	0	2	0	0	1	0	1	0	0	4	0	0	1	3	0	0	0	0
	2008	100	0	5	22	14	19	11	11	11	10	8	0	100	0	0	38	24	30	7	1
2009	55	0	4	6	13	7	9	4	5	7	0	0	53	2	0	11	21	18	4	1	
2010	57	0	2	3	14	11	9	9	3	6	0	0	57	0	0	14	25	12	3	3	
2011	98	0	7	14	18	15	14	11	8	11	0	0	98	0	0	19	32	32	5	10	
2012	252	0	11	38	57	41	32	25	26	22	0	0	251	1	0	46	61	123	12	10	
2013	178	0	8	27	34	34	25	18	15	17	0	0	177	1	0	29	59	61	18	11	
2014	50	0	0	5	8	10	7	8	4	8	0	0	50	0	0	5	22	16	4	3	
2015	66	0	2	10	8	11	13	9	3	10	0	0	64	2	0	11	14	33	5	3	

## ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge	Year	Total Arrests	Age Group:								Gender:			Race-Ethnicity:						
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
PL 230.05 PATRONIZE PROSTITUTE-2ND	1990	4	0	1	0	0	1	2	0	0	0	3	1	0	2	1		1	0	0
	1991	1	0	0	0	1	0	0	0	0	0	1	0	0	0	1		0	0	0
	1992	2	0	0	0	1	0	0	0	0	2		0	0	1	1	0	0	0	
	1993	1	0	0	0	0	0	1	0	0	1	0	0	0	1	0		0	0	
	1994	5	0	0	0	1	1	0	1	0	4	1	1	0	2	2	1	0	0	
	1995	4	0	1	1	1	1	0	0	0	3	1	1	0	1	2		0	1	
	1996	5	0	0	0	0	1	2	1	1	5	0	0	0	1	2		1	0	
	1997	7	0	0	1	1	1	1	3	0	7	0	0	0	3	2	2	0	0	
	1998	1	0	0	0	1	0	0	0	0	1	0	0	0	0	1		0	0	
	1999	13	0	0	1	2	2	3	4	1	13	0	0	0	2	7	4	0	0	
	2010	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0		1	0	
	2011	1	0	0	1	0	0	0	0	1		0	0	0	0	0	1	0	0	
	2013	3	0	0	0	3	0	0	0	3	0	0	0	0	0	0	3	0	0	
	1994	1	0	0	0	1	0	0	0	0	1	0	0	0	0	1		0	0	
	1998	1	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	
PL 230.06 PATRONIZE PROSTITUTE-1ST	1999	1	0	0	1	0	0	0	0	0	0	1	0	0	0	1	0	0	0	
	1999	1	0	0	0	1	0	0	0	0	0	0	1	0	0	1	0	0	0	
	1999	1	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	
	2009	1	0	0	0	0	1	0	0	0	1	0	0	0	0	1	0	0	0	

# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge PL 230.20 PROMOTING PROSTITUTION-4TH	Year	Total Arrests	Age Group:										Gender:			Race-Ethnicity:				
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
1990	40	0	0	2	6	8	13	3	4	4	0	6	34	0	10	4	17	9	0	
1991	40	0	0	2	8	10	6	6	4	4	0	15	25	0	8	12	10	10	0	
1992	66	0	1	14	7	8	8	5	11	12	0	16	50	0	13	5	35	13	0	
1993	146	0	4	22	23	24	26	19	13	15	0	29	117	0	44	12	61	29	0	
1994	90	0	0	10	18	15	13	18	9	7	0	26	64	0	18	9	26	37	0	
1995	46	0	2	4	7	10	10	3	2	8	0	9	37	0	5	6	17	18	0	
1996	51	0	0	6	15	3	10	9	3	5	0	25	26	0	12	8	13	18	0	
1997	38	0	0	5	13	2	3	2	8	5	0	18	20	0	5	5	6	22	0	
1998	76	0	1	10	18	13	16	6	2	10	0	41	33	2	10	21	26	19	0	
1999	66	0	3	4	19	4	11	7	5	13	0	27	39	0	15	15	28	8	0	
2000	58	0	2	7	13	8	7	6	9	6	0	25	33	0	14	6	28	10	0	
2001	59	0	2	10	11	5	11	4	8	8	0	31	28	0	11	11	25	12	0	
2002	46	0	3	7	6	9	7	9	3	2	0	27	19	0	9	14	20	3	0	
2003	40	0	2	4	9	6	4	4	5	6	0	22	18	0	7	9	20	4	0	
2004	35	0	0	5	6	5	7	5	4	3	0	17	18	0	5	11	10	8	1	
2005	45	0	6	4	8	5	6	5	4	7	0	20	25	0	5	9	18	13	0	
2006	23	0	2	0	4	1	5	4	1	6	0	15	8	0	1	5	3	12	2	
2007	63	0	3	4	8	8	8	5	3	24	0	31	32	0	4	14	12	33	0	
2008	57	0	3	2	8	8	7	13	7	9	0	41	16	0	9	16	17	15	0	
2009	28	0	0	0	2	2	6	4	2	12	0	17	11	0	2	5	7	12	2	
2010	24	0	0	2	3	1	2	2	6	8	0	14	10	0	2	3	8	11	0	
2011	25	0	1	2	2	3	1	4	4	8	0	12	13	0	5	6	0	14	0	
2012	22	0	0	2	3	2	3	3	3	4	0	15	7	0	2	3	3	14	0	
2013	11	0	0	0	0	0	0	2	3	6	0	4	7	0	1	1	3	6	0	
2014	16	0	1	1	3	4	0	2	3	2	0	12	4	0	2	8	3	3	0	
2015	25	0	0	1	2	6	4	3	2	7	0	14	11	0	7	4	3	11	0	

# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge	Year	Total Arrests	Age Group:								Gender:			Race-Ethnicity:						
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
PL 230.25 PROMOTING PROSTITUTION-3RD	1990	38	0	1	6	10	9	6	5	1	0	0	9	29	0	11	3	10	14	0
	1991	20	0	3	3	5	5	2	0	0	2	0	6	14	0	4	1	13	2	0
	1992	9	0	0	1	2	1	2	1	1	1	0	1	8	0	1	2	2	4	0
	1993	34	0	3	0	7	8	8	5	0	3	0	12	22	0	5	6	10	13	0
	1994	10	0	0	2	0	2	2	3	0	1	0	4	6	0	2	0	3	5	0
	1995	30	0	3	5	4	3	3	4	2	6	0	10	20	0	8	5	6	11	0
	1996	72	0	1	6	20	12	10	11	5	7	0	32	40	0	9	6	34	23	0
	1997	52	0	5	4	10	9	6	8	4	6	0	20	32	0	15	6	22	9	0
	1998	39	0	0	1	8	8	5	6	6	5	0	15	24	0	8	2	20	9	0
	1999	68	0	2	12	15	9	8	8	7	7	0	38	30	0	7	1	41	19	0
	2000	43	0	6	6	10	4	4	6	4	3	0	34	9	0	1	4	32	6	0
	2001	57	0	6	10	9	13	5	2	3	9	0	45	12	0	0	8	44	5	0
	2002	53	0	4	14	12	3	12	3	2	3	0	34	19	0	6	10	32	2	3
	2003	37	0	4	7	4	6	8	2	3	3	0	29	8	0	6	7	20	4	0
	2004	47	0	4	4	8	8	9	4	3	7	0	32	15	0	11	7	19	10	0
	2005	44	0	1	4	4	7	9	9	2	8	0	26	18	0	12	7	15	10	0
2006	39	0	0	4	12	5	4	5	4	5	0	27	12	0	3	3	17	14	2	
2007	63	0	2	3	7	11	14	5	8	13	0	33	30	0	5	2	12	44	0	
2008	61	0	1	7	14	6	7	3	8	15	0	40	21	0	11	9	20	19	2	
2009	14	0	0	2	2	2	0	2	2	3	0	5	9	0	0	3	2	9	0	
2010	15	0	1	1	1	0	3	3	1	3	0	10	5	0	1	9	0	5	0	
2011	13	0	0	0	0	1	2	0	3	3	0	5	8	0	3	0	1	9	0	
2012	22	0	0	0	0	3	4	2	4	3	0	11	11	0	7	4	2	8	1	
2013	7	0	0	0	1	1	2	1	2	1	0	4	3	0	1	2	1	3	0	
2014	3	0	1	0	0	0	0	1	0	0	0	3	0	0	0	3	0	0	0	
2015	13	0	0	1	1	1	2	0	4	1	4	10	3	0	5	2	2	4	0	

# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge	Year	Total Arrests	Age Group:										Gender:			Race-Ethnicity:				
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
PL 230.30 PROMOTING PROSTITUTION-2ND	1990	3	0	1	0	0	2	0	0	0	0	0	3	0	0	0	3	0	0	0
	1991	2	0	1	0	0	1	0	0	0	0	0	2	0	0	0	1	0	1	0
	1992	5	0	1	2	1	1	0	0	0	0	0	4	1	0	0	4	1	0	0
	1993	9	0	1	0	3	1	1	1	1	1	0	4	5	0	1	2	5	1	0
	1994	2	0	0	0	0	1	0	0	1	0	0	1	1	0	1	0	0	1	0
	1995	2	0	0	0	1	0	0	0	1	0	0	2	0	0	0	2	0	0	0
	1996	9	0	1	1	1	3	1	0	1	1	0	8	1	0	2	4	3	0	0
	1997	8	0	1	1	3	0	2	0	1	0	0	3	5	0	1	3	4	0	0
	1998	11	0	0	1	6	2	0	2	0	0	0	9	2	0	3	6	2	0	0
	1999	6	0	0	1	0	0	2	0	0	1	0	2	4	0	3	1	2	0	0
PL 230.32 PROMOTING PROSTITUTION-1ST	2000	6	0	3	0	1	1	1	0	0	0	0	6	0	0	0	3	2	1	0
	2001	4	0	1	1	0	0	1	1	0	0	0	2	2	0	0	3	1	0	0
	2002	12	0	4	1	2	1	0	3	1	0	0	9	3	0	1	9	2	0	0
	2003	3	0	2	0	1	0	0	0	0	0	0	3	0	0	0	2	1	0	0
	2004	7	0	0	3	2	0	1	1	0	0	0	3	4	0	4	1	2	0	0
	2005	8	0	0	2	2	0	1	1	1	1	0	4	4	0	5	2	1	0	0
	2006	5	0	0	0	1	1	1	0	0	2	0	3	2	0	2	0	2	1	0
	2007	3	0	1	1	0	0	0	1	0	0	0	2	1	0	0	0	3	0	0
	2008	1	0	1	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0
	2009	4	0	0	0	1	2	0	0	0	1	0	1	3	0	1	1	1	0	0
PL 230.34 SEX TRAFFICKING	2010	1	0	0	0	0	0	0	0	1	0	0	1	0	0	0	1	0	0	0
	2011	2	0	0	0	1	1	0	0	0	0	0	1	1	0	0	1	1	0	0
	2014	5	0	2	1	0	0	1	1	0	0	0	3	2	0	1	3	1	0	0
	2015	1	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0
	1996	1	0	0	0	0	0	0	1	0	0	0	0	1	0	0	1	0	0	0
	1999	1	0	0	0	0	0	0	1	0	0	0	1	0	0	0	1	0	0	0
	2001	2	0	0	0	0	2	0	0	0	0	0	2	0	0	0	0	2	0	0
	2009	1	0	0	1	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0
	2011	9	0	1	1	4	1	1	0	0	1	0	7	2	0	0	5	2	0	0
	2012	7	0	0	2	3	1	0	0	0	1	0	6	1	0	0	4	3	0	0
PL 230.34 SEX TRAFFICKING	2013	7	0	1	2	0	1	2	0	1	0	0	6	1	0	0	6	0	1	0
	2014	10	0	2	1	1	1	2	1	1	1	0	10	0	0	1	8	1	0	0

## ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge	Year	Total Arrests	Age Group:								Gender:			Race-Ethnicity:						
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
	2015	7	0	0	0	0	4	1	0	0	2	0	7	0	0	0	4	1	2	0

# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge PL 230.40 PERMITTING PROSTITUTION	Year	Total Arrests	Age Group:										Gender:			Race-Ethnicity:				
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other	Unk.
1990	1990	16	0	1	0	5	4	2	1	0	3	0	13	3	0	3	5	6	2	0
1991	1991	8	0	0	0	3	1	1	1	0	2	0	7	1	0	3	1	3	1	0
1992	1992	28	0	1	6	4	5	7	1	1	3	0	20	8	0	12	1	7	8	0
1993	1993	81	0	6	20	15	13	16	5	2	4	0	33	48	0	34	13	18	16	0
1994	1994	53	0	1	14	9	10	12	4	1	2	0	19	34	0	10	8	19	16	0
1995	1995	34	0	0	7	6	6	7	2	2	4	0	10	24	0	4	0	11	19	0
1996	1996	38	0	3	2	9	11	5	3	0	5	0	10	28	0	8	8	11	11	0
1997	1997	26	0	0	4	8	3	4	4	2	1	0	10	16	0	5	3	10	8	0
1998	1998	60	0	3	7	12	15	11	8	3	1	0	22	38	0	19	11	15	15	0
1999	1999	76	0	2	5	12	22	11	11	6	7	0	38	38	0	12	2	28	34	0
2000	2000	59	0	0	7	17	9	8	6	3	9	0	29	30	0	12	5	13	29	0
2001	2001	45	0	0	3	5	5	12	8	6	6	0	21	24	0	6	4	12	23	0
2002	2002	18	0	0	0	4	4	1	3	2	4	0	6	12	0	1	4	0	13	0
2003	2003	7	0	0	0	0	0	2	1	1	3	0	1	6	0	3	1	2	1	0
2004	2004	21	0	0	0	2	3	2	6	4	4	0	10	11	0	1	1	4	14	1
2005	2005	33	0	0	4	5	4	5	4	4	7	0	12	21	0	4	3	8	17	1
2006	2006	22	0	0	2	4	5	4	2	3	2	0	15	7	0	3	0	9	10	0
2007	2007	12	0	0	1	4	1	1	3	1	1	0	5	7	0	4	0	2	6	0
2008	2008	6	0	0	0	1	1	3	0	0	1	0	1	5	0	1	3	0	1	1
2010	2010	6	0	0	0	0	1	2	0	3	0	0	0	6	0	2	0	0	4	0
2011	2011	4	0	0	2	0	1	0	0	1	0	0	0	4	0	2	0	0	2	0
2012	2012	5	0	0	0	0	0	0	1	3	1	0	0	5	0	0	0	0	5	0
2013	2013	23	0	0	1	0	0	3	6	7	6	0	1	22	0	3	0	1	19	0
2014	2014	3	0	0	0	1	1	0	0	0	1	0	1	2	0	0	1	1	1	0
2015	2015	1	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	1	0



# ADULT ARRESTS FOR SEX OFFENSES AND PROSTITUTION OFFENSES IN NEW YORK COUNTY

Top Arrest Charge PL 230 PROSTITUTION OFFENSES TOTAL	Year	Total Arrests	Age Group:										Gender:		Race-Ethnicity:				
			13-15 JO only	16-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Unk.	Male	Female	Unk.	White	Black	Hispanic	Other
1990	1512	0	178	471	500	196	118	30	6	13	0	182	1327	3	754	448	228	82	0
1991	783	0	60	191	207	165	89	39	19	13	0	180	602	1	340	178	183	82	0
1992	698	0	46	139	152	166	104	38	27	26	0	264	434	0	229	126	229	114	0
1993	1095	0	71	203	291	208	167	72	37	46	0	488	607	0	400	208	326	160	1
1994	1889	0	116	368	476	385	244	157	71	72	0	#####	637	0	778	409	364	338	0
1995	1265	0	78	199	324	259	204	91	49	61	0	713	550	2	396	275	318	276	0
1996	1612	0	110	241	388	341	246	147	73	66	0	805	805	2	466	374	453	319	0
1997	1392	0	124	190	322	264	214	111	91	76	0	723	666	3	465	394	325	208	0
1998	1677	0	162	316	331	319	252	147	61	89	0	759	916	2	545	439	484	209	0
1999	1697	0	143	315	352	306	248	172	69	92	0	774	919	4	446	409	560	282	0
2000	1711	0	230	350	329	284	218	138	87	75	0	749	960	2	451	490	559	211	0
2001	1705	0	271	350	323	280	210	143	67	61	0	754	949	2	367	538	604	196	0
2002	2018	0	355	410	361	282	269	186	97	58	0	917	1101	0	472	802	567	166	11
2003	1411	0	250	268	257	208	178	107	67	76	0	753	658	0	298	532	436	120	25
2004	1397	0	228	244	256	220	181	136	67	65	0	775	622	0	272	516	395	165	49
2005	1625	0	212	226	300	251	249	188	101	98	0	805	820	0	274	584	384	345	38
2006	804	0	125	142	144	122	94	90	40	47	0	441	363	0	146	269	207	147	35
2007	819	0	80	144	130	127	121	87	61	69	0	350	469	0	141	179	215	273	11
2008	736	0	71	110	118	124	101	82	64	66	0	345	391	0	136	191	202	200	7
2009	432	0	41	63	81	62	66	39	39	41	0	138	294	0	68	129	93	134	8
2010	332	0	40	61	59	50	43	24	28	27	0	124	208	0	52	131	60	83	6
2011	383	0	41	68	71	48	45	47	30	33	0	192	191	0	70	133	67	98	15
2012	619	0	37	117	115	83	71	70	73	53	0	335	284	0	119	171	195	117	17
2013	555	0	47	79	104	88	69	62	56	50	0	248	307	0	114	146	137	140	18
2014	610	0	65	131	119	88	62	62	35	48	0	126	484	0	138	195	117	155	5
2015	499	0	39	86	94	89	65	44	33	49	0	139	360	0	108	145	111	125	10



E X H I B I T   D-2



Division of Criminal  
Justice Services

November 1, 2016

Mr. Royce Corley  
Reg. No. 68011-054  
Federal Correctional Institution  
33 ½ Pembroke Road  
Danbury, CT 06811-3099

Dear Mr. Corley:

This is in response to your Freedom of Information Law (FOIL) request for records from the "Computerized Criminal History System" from the years 1990 through 2015 regarding the following:

1. Demographics (by age, gender, race-ethnicity) of all convictions for Prostitution Offenses (Penal Law Art. 230 in the County of New York organized by the highest conviction charge.
2. Demographics (by age, gender, race-ethnicity) of all convictions for Prostitution Offenses (Penal Law Art. 230 in the State of New York organized by the highest conviction charge.

Enclosed is the data that is responsive to your request.

Pursuant to POL §89(4)(a), you may appeal this determination within 30 days to the Counsel, Division of Criminal Justice Services, 80 South Swan Street, Albany, NY 12210.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Valerie Friedlander".

Valerie Friedlander  
Records Access Officer

Enclosure

## PROFILE OF PERSONS CONVICTED OF PROSTITUTION OFFENSES

New York County	Top Conviction Chg PL 230.00 PROSTITUTION	Total Convicted	Disposition Year																									
			1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
			1117	406	262	215	327	214	311	323	437	343	541	578	668	468	354	301	174	148	139	121	76	68	82	52	38	26
PL 230.03 PATRONIZE PROSTITUTE-4TH- PROSTITUTIN IN SCHOOL ZONE*	Age Group:	16-17	3	1	2	1				4	3	2	10	6	7	2	10	2	3	2	2	1	1					
		18-20	123	26	24	15	20	14	22	33	55	40	95	92	108	94	62	50	29	21	21	13	7	7	4	2		
		21-24	397	104	61	39	81	43	44	62	93	86	133	140	147	113	76	52	41	35	28	21	20	19	23	10	4	5
		25-29	393	119	65	67	105	57	85	71	92	63	93	109	124	87	77	62	34	20	32	23	18	13	10	8	8	8
		30-34	128	99	64	55	68	53	74	66	76	58	92	96	91	77	49	37	26	25	14	20	16	8	11	13	9	7
		35-39	58	35	35	30	36	31	47	44	83	52	63	66	80	51	46	43	23	17	20	15	6	7	7	8	4	3
		40-44	15	18	8	5	11	13	25	25	26	28	38	48	74	25	22	36	14	22	9	8	3	9	9	2	7	
		45-49		2	2	2	5	3	10	16	6	11	15	17	34	14	6	12	1	5	7	10	3	4	12	7	3	
		50+		2	1	1	1	1	4	2	3	3	2	4	3	5	6	7	3	1	6	10	2	1	6	2	3	
		Gender:	Male	45	29	83	83	125	75	82	59	106	125	204	197	238	189	164	113	74	38	48	42	22	24	22	17	17
			Female	1070	376	179	132	202	139	228	262	331	215	336	381	430	279	190	188	100	110	91	79	54	44	60	35	21
		Race:	Unknown	2	1					1	2		3	1														
			White	575	192	79	73	112	57	70	102	127	61	106	127	74	62	44	25	35	19	20	9	11	18	12	9	2
		Ethnicity:	Black	378	119	89	57	119	82	116	137	172	137	242	254	339	240	191	158	91	71	67	59	43	37	43	31	21
			Hispanic	136	84	87	77	85	72	110	70	129	137	171	183	191	135	81	73	46	30	43	33	16	13	17	9	8
		Total Convicted	Asian/Indian	28	11	7	7	11	3	15	14	9	8	22	14	16	18	18	25	11	12	10	7	8	6	3		1
			Unknown				1								2	1	2	1	1	1		2		1	1			1

# PROFILE OF PERSONS CONVICTED OF PROSTITUTION OFFENSES

[illegible]

## PROFILE OF PERSONS CONVICTED OF PROSTITUTION OFFENSES

New York County	Top Conviction Chg PL 230.25 PROMOTING PROSTITUTION-3RD	Total Convicted	Disposition Year												
			1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
New York County	PL 230.30 PROMOTING PROSTITUTION-2ND	Total Convicted	16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
New York County	PL 230.34 SEX TRAFFICKING	Total Convicted	16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
New York County	PL 230.30 PROMOTING PROSTITUTION-2ND	Total Convicted	16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
New York County	PL 230.34 SEX TRAFFICKING	Total Convicted	16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black
			16-17	18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Male	Female	White	Black

## PROFILE OF PERSONS CONVICTED OF PROSTITUTION OFFENSES

New York County	Top Conviction Chg PL 230.40 PERMITTING PROSTITUTION	Disposition Year																										
		Total Convicted																										
		18-20	21-24	25-29	30-34	35-39	40-44	45-49	50+	Gender: Male	Female	White	Black	Hispanic	Asian/Indian	Unknown	Male	Female	White	Black	Hispanic	Asian/Indian	Unknown	Male	Female	White	Black	Hispanic
1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015			
TOTAL PL 230	Total Convicted	1142	428	295	252	383	26	357	392	504	435	615	650	738	555	432	397	216	206	165	152	100	88	13	87	65	4	
	16-17	4	2	2	1				4	3	2	10	7	8	2	1	2	3	2	2	1							
	18-20	125	28	25	15	25	15	25	33	56	47	97	96	111	100	67	51	32	22	22	13	7	7	5	2	2		
	21-24	398	108	65	42	87	44	49	65	96	93	141	146	153	123	84	64	44	40	31	21	22	21	25	13	6		
	25-29	398	122	69	7	115	64	93	84	105	75	102	118	134	97	87	79	39	28	34	29	2	15	25	12	12		
	30-34	135	104	67	60	79	63	84	81	95	73	108	103	103	89	59	48	35	33	18	22	12	18	20	1			
	35-39	60	37	41	36	44	41	57	55	96	77	79	84	99	68	67	49	29	26	23	25	10	7	9	16	7		
	40-44	17	2	12	16	24	19	31	36	35	44	49	60	84	47	40	57	27	32	13	14	3	14	17	6	1		
	45-49		3	7	7	8	9	1	25	12	19	22	23	38	24	9	23	7	13	10	13	4	5	18	1	8		
	50+	4	3	7	4		6	7	9	6	11	7	13	8	11	14	24	6	10	12	14	10	7	14	7	8		
	Unknown																											
	Gender:	Male	53	44	99	96	169	104	111	117	158	197	262	250	307	264	234	202	113	89	77	68	42	42	63	49	40	
		Female	1087	383	196	156	214	157	245	273	346	235	352	400	437	291	198	195	103	117	94	84	58	46	68	38	25	
		Unknown	2							2		3																
	White	58	200	85	8	126	63	78	116	138	74	114	139	129	83	77	56	28	45	20	23	15	13	26	17	10		
	Black	382	124	95	6	133	99	125	167	197	175	276	284	375	292	238	218	127	92	74	72	57	63	46	37	27		
	Hispanic	157	93	107	102	102	93	135	93	158	175	199	207	214	160	107	96	54	49	52	44	22	14	33	22	15		
	Asian/Indian	28	1	8	7	22	6	19	16	1	1	26	20	18	19	19	25	17	18	19	10	17	9	8	3			
	Unknown													2		3	2	2	2		3							

EXHIBIT E

"Ashley, wait!" he said, and started to cry like a baby.

"Get the hell away from me and get yourself some help," I said as I ran out, checked out, and headed to the airport. It took me the whole flight back to recover. I worried: Would Anna acquiesce to his request?

TWELVE

where are you  
taking me?

A little over a year went by and I still had not won custody of Isabella. The case dragged on. I could tell during court appearances that Mike was tiring of the battle—or, more likely, the expense of the battle. We were both paying thousands of dollars a month in legal bills.

Just as I began to get more unsupervised time with Isabella in my custody fight, just as I was carving out an identity as a PTA leader, my world came crashing down. The investigators for then Manhattan district attorney Robert Morgenthau found me as soon as Kristin was busted. They didn't arrest me, but I was called in for questioning to One Hogan Place, the DA's

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rebecca kade

headquarters at the state criminal courthouse. Nobody told me to bring a lawyer. I took the subway downtown and had plenty of time on the journey to contemplate my imminent loss of freedom and, worse, my daughter. I was a nervous wreck when I arrived. Would I be arrested now? Prostitution is a class B misdemeanor in New York State: I could get three months in jail! My custody battle for Isabella would be lost.

I went through the metal detectors and up to a dreary floor lined with green and gray metal filing cabinets right out of a forties noir film. It looked as if they hadn't bought a new desk in decades. I was led into a room with a plain gray metal table, a few raggedy chairs, and a horrific fluorescent light overhead.

Two men came in, and one sat at the table in front of me. "Miss Kade," said one. "I am Assistant District Attorney Artie McConnell, and this is . . ." My mind went on overbuzz at the words "assistant district attorney" and I didn't even catch the other man's name. He looked like he'd graduated law school the week before and appeared to be less important, as he sat on the side of the room and not at the table where Mr. McConnell and I were sitting facing one another.

"Ms. Kade, we have asked you to come in today because we would like to discuss a few things with you regarding your relationship with Kristin Davis. As you are probably aware, she was arrested recently, and we are prosecuting her on several charges and talking to people who knew her. Your name has come up, but we anticipate this to be a relatively short interview. I have a document here for you to sign. It is a debriefing agreement, and it merely states that you are free to leave at any time and that statements you make during this interview could be used in a future prosecution. However, any statement you make today cannot

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call girl confidential

be used to prosecute you in the future." I signed the document, but to be honest, I didn't have a clue what he had just said or what that document was supposed to mean to me. I just heard my sister's voice saying *Tell the truth*, and that was what I was going to do.

Mr. McConnell and his assistant started interrogating me.

Had I worked as an escort for Kristin Davis?

"Yes." They obviously knew I had or I wouldn't be there.

"Have you worked for anyone else, and if so, who?" McConnell asked.

"Ummm, a company called Classic Affairs," I answered hesitantly.

"God, these names are so clichéd. Who runs it?"

I stalled. "A woman . . . named Anna." I did not want to answer that question. I thought this was going to be purely about Kristin! Now I would be implicating myself with another madam? He put his pen down, and he and the other man looked at each other and nodded.

"Will you excuse us for a minute?" McConnell said, and they both walked out of the room and shut the door. That was it? They had only asked me a couple of questions, and the tone in the room had completely changed. After a few minutes they came back in. "We're going to have to transfer you to another location, Ms. Kade," said McConnell.

"You can't be here anymore," he said sternly as he shut the door behind him so no one could see inside the room.

"Why?" I asked.

"We'll have to explain that to you later," he said. "We're going to have some people escort you out of the building to an unmarked car. We will make sure you will be covered so no

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one can see you leaving the building. We're taking you to a safer location."

"What? Why?" I sputtered.

"They'll explain it when you get there. Come on," he said, taking my arm.

"No!" I said, pulling back. "I'm not going anywhere until I know what's going on and someone in my family knows where I'm going."

I called my sister and gave her a quick rundown of where I was and that I was going to another location. I told her I had a signed document giving me rights that I would mail to her as we were leaving the building. I didn't trust these guys, and I felt uncomfortable having paperwork like that in my apartment. She instructed me again to tell the truth.

After a few minutes, three big guys with gold detectives' badges on thin metal chains hanging around their necks came in and said my time was up on the phone.

"OK, Bridget, I have to go," I said. "You should hear from me tonight. If you don't, you know something went wrong." I was thinking, *This is ridiculous. What is going on? Why are they being so dramatic?* I felt as if I were being pulled into a movie.

"You have to come with us now," said the biggest of the cops. They slipped a lanyard with an orange ID card on it around my neck. Then they threw my coat over my head and led me past the old green metal filing cabinets down a dingy hallway to an elevator bank, then down and out the side door of the courthouse. They had me surrounded, my coat still over my head. They put me in the back of a car, one cop on either side, and we sped off. I was terrified.

In the unmarked car, they took my coat off my head. I wasn't

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rebecca kade

been seized from a drug dealer and was now a secret special investigations headquarters.

"Where am I?" I demanded after they took me into a cramped office.

"You are in the Official Corruption Unit of the Manhattan District Attorney's Office," said one investigator. "You mentioned a person who we have been investigating for quite some time: Anna. Can you tell us anything about her?"

I knew I had valuable information. I was one of the few girls Anna had allowed to get close to her. But I didn't want to talk about her, and I certainly wasn't about to name clients. Not only had these men kept me afloat, but I was terrified that Anna would find out and come after me. As scared as I was of being arrested, tried, and jailed, I still was not prepared to give them clients' names.

The investigators asked me questions about the business. How was I paid? Did I work over state lines? Did I work internationally? Was drug dealing involved?

"Why should I tell you anything?" I demanded. "She's your best friend if you're nice to her, but if you cross her, she's a killer. Just ask Jason Itzler."

Itzler was the self-styled "King of All Pimps," who once had Ashley Alexandra Dupré, the girl who brought down Eliot Spitzer, working at his agency, New York Confidential. Itzler claimed that Gristina had sent three thugs, one of them armed, to threaten him and scare girls out of working for him instead of her. Itzler would later tell a New York tabloid, "She's the most vindictive bitch in the escorting game. Dangerous, dangerous, dangerous."

"Well, Ms. Kade, we already have evidence that you worked

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call girl confidential

handcuffed. I asked right then and there, "Am I being arrested?" They assured me that I was not—in fact, far from it. They said that I wasn't safe in that building. They said it was very possible that I had important information they had been looking for in an investigation, and that there were concerns that there might be a leak or mole in their own office. They wanted to get me out before anyone knew I was there. I never saw ADA McConnell again.

It's very possible that someone in the district attorney's office had been warning Anna as they cracked down on other madams and pimps. Maybe someone there was a client. I don't know what the explanation was, but somehow Anna had gone unscathed.

I was more confused than ever. What the hell did I know that was so damn important that they had to cover my head with my coat, throw me in the back of a car, and speed off from the Manhattan district attorney's office to some secret location? *This has to be a joke*, I thought. The only problem was, I didn't know any of these people, so why would they want to play a joke on me? The driver cruised past the Metropolitan Correctional Center and then we were navigating the streets of Chinatown, past barkers on Canal Street who were openly bringing tourists into rooms behind false walls in their shops to buy counterfeit watches and purses as the cops cruised by. The vegetable stands disappeared, and soon we passed luxury leather goods boutiques and galleries as we drove farther down the cobblestone streets of SoHo. Were we headed to another precinct? Suddenly, in the middle of SoHo, we stopped in front of an old converted warehouse, got out, and took the renovated elevator upstairs into a gigantic, light-filled loft. No old metal filing cabinets there. I learned later that it had

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call girl confidential

as a prostitute through your connection with Kristin Davis. If we prosecute you and you are convicted, you could get a jail sentence."

I'd never get Isabella back if that happened. So I made my decision—one that would determine the next four years of my life.

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## THIRTEEN

## my life as a confidential informant begins

The Manhattan district attorney's investigators already knew that Anna regularly boasted that she had law enforcement connections. Sultry Irma Nici, who claimed to have had sex with David Beckham and who'd worked for Anna for six months, had already told prosecutors as much.

That's part of what kept Anna in business so long, some surmised, and that's why the Official Corruption Unit, rather than the Sex Crimes Unit—the one once headed by the famous prosecutor turned mystery writer Linda Fairstein—was in charge of the investigation.

The investigators asked me more questions that day, and the

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rebecca kade

next. They showed me a lot of surveillance photos to see if I could ID anyone. This went on for days, then weeks. They would drive me home at the end of the day, then pick me up first thing the next morning to be interrogated again.

I was missing so much school that they had to write me an excuse, like in high school: "Miss Kade was witness to a serious crime in the recent past," they wrote. "She [has had to] report to our office. . . . These duties consumed a great deal of Ms. Kade's time."

I was missing school by day, but by night I was still working for Anna. I was still working as an escort, and the prosecutors knew it. I would eventually learn why they had allowed me to keep breaking the law.

"What is Anna's last name?" the ADA grilled me.

"Who knows what her real name is?" I answered. "She's gone by Anna Tennant, Anna Gristina, Anna Scotland. She was born in Scotland; I doubt that name's real."

It was clear to me that the investigators had very little information on Anna, and they pumped me for as much as they could. I told them what I knew about the business, the key players, but I did not give up clients' names. They pressured me with photo lineups, and it was when I saw the photo of Edward—my pedophile client—that I had a breakdown in their office. Just seeing his face caught me off guard, and I cried hysterically. Feeling somewhat relieved, I revealed the truth about him.

"Ms. Kade, we want you to do something for us," one of the prosecutors told me after weeks of questioning.

"What more do you want?" I practically cried in exasperation.

"We want you to start recording your conversations with

call girl confidential

Anna Gristina," he said. "We want you to gather some evidence for us."

*Wait, I thought. Isn't that the job of an undercover cop? Like on TV, when a beautiful young female cop only pretends to go work for an escort service? How the hell would I pull that off?* I was terrified. They made it seem as if I had a choice. But I didn't.

I couldn't fathom how a wiretap would work. First of all, there was the matter of Anna's preference for texts over phone calls. She changed her phone numbers constantly, and if she ever did call you, it would usually be brief and to the point. But the investigators had a lot of specific questions they wanted me to ask her that would lead to her arrest and conviction. It was true that Anna had started to open up to me. She would call me from her farm upstate to book a high-level client, and we'd end up having long, friendly conversations. But how was I going to suddenly ask her *Law & Order*-type questions in the middle of a gal-pal chat? Not to mention that, while alone at my house, I would have to manage outdated tape recorders, the only equipment the technical department had after years of city budgetary cutbacks.

The prosecutors wanted me to record Anna talking all about her clients, her girls, how she ran the business, the law enforcement connections she boasted about, and what she had done about the child predator's request.

I was scared. Anna is your best friend when you're on her good side, but she will slit your throat if you cross her.

What's more, Anna had become increasingly cautious, even paranoid, ever since Andreia Schwartz had been deported. Andreia, a pretty Brazilian escort turned madam who had worked at the Emperor's Club V.I.P. agency with Eliot Spitzer's call girl Ashley Dupré, had been deported in March 2008 after serving

eighteen months in prison. Spitzer's use of escorts, uncovered by the FBI, had led to the sweep by the Manhattan DA that brought down Kristin. Andreia would end up serving time in a predominantly male sex offenders' unit on Rikers Island and forfeit half a million dollars after pleading guilty to promoting prostitution, a class D felony, in October 2008. (Cecil Suwal owned Emperor's Club V.I.P. with her boyfriend, Mark Brenner, forty years her senior. It was the Emperor's Club V.I.P. listing of my client Eliot Spitzer as their Client No. 9 that led to the New York governor's resignation.) Anna believed that Andreia had informed on her, and now she was keeping a low profile by isolating herself on her upstate farm. It would be too suspicious for me to visit her there.

"We'll have to try wiretapping a phone call," said Morgenthau's assistant district attorney on the case (and the first of several handlers I would work with).

They set up a wiretap on my phone, the one on which Anna always called to do business or just to chat. I would have to use every skill set I had to elicit the kind of information the ADA wanted in the middle of a girlfriend-to-girlfriend call.

The other form of communication that Anna was using was Skype. She found it useful because it couldn't be traced and was completely safe—or so she thought. It would be extra tricky for me because Skype calls are video chats, so she could see everything I was doing.

One of the first conversations I had with Anna was in early April of 2008. It was the call I was waiting for: Kristin had just been arrested, and Anna wanted to check in and make sure I was OK. I was in my bedroom doing homework in my yoga clothes when the phone rang and I saw her personal number pop up. I froze, but then sprang into action. I'd attached the wires to each

connector of my cell phone and left them that way when I was at home so I would never miss a word. My heart pounding, I pushed RECORD on the equipment, put the earpiece in my ear, and laid out the ADA's talking points in front of me. My life as a confidential informant had begun.

R: That's the problem, you can't talk to anybody about it. Who can you talk to?

A: I'm here. I don't know if we're all just paranoid. Don't be scared to call anytime.

Call anytime? If only Anna knew.

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rebecca kade

pimp. It was like sex slavery at the behest of the Manhattan District Attorney's Office. This cowboy still has a job in law enforcement, in another state, at an even higher level.

Obviously, if I did this with every client I saw, I would have been broke, so I didn't tell him about everybody.

Anna continued to hook me up. One of my heavy hitters at the time was Brent. Brent was a complete sicko, but money was tighter than ever and I was compromising myself in ways I never thought possible. But if Brent wanted to see me twice in one week, I was \$20,000 richer by Friday.

They weren't all bad. I had one client, an Asian billionaire who preferred to be called Henri, who was incredibly generous and easygoing. Henri was living in New York for about a year to sort out some banking problems, and his wife stayed back in their home country with the children. Henri had to have companionship, so he would have his chauffeur come pick me up in his Bentley. It was a bit awkward because his driver, John, was an off-duty cop, my client revealed with a chuckle. One night, John picked me up, and as we got stuck in a midtown logjam, I decided to break the barrier of silence. I didn't know if he would respond or not, but I asked him about himself and chatted amiably. But surely he knew what was going on.

Having someone who works as a police officer during the day drive me around, knowing full well that I was an escort, was not a comforting feeling. In fact, I was nervous each time I saw him. Henri always laughed at me and said, "If you pay those guys enough, they will do anything." That wasn't true, and I knew it. John needed the money to help pay for child support and was currently in the middle of a custody battle. Bingo! Right then I felt his pain and understood why he would take the demeaning

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FIFTEEN

## going undercover

The assistant district attorney's office couldn't believe the information I provided in my first wiretap. But my work was far from over. It was clear to them I was an invaluable asset, and so they encouraged me to keep on working for Anna as a call girl. It was like the Wild West. They wanted me to keep breaking the law so they could get more information.

I highly doubt District Attorney Morgenthau was aware of the ADA's shenanigans. The ADA told me to work in order to garner information for him, and then turn over to his office the money and any gifts that clients gave me. I actually did this. God knows if somebody pocketed the money. Technically, this ADA was my

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call girl confidential

commands from Henri and work ridiculous hours, only to wake up and go and be one of New York's Finest. A lot of police think prostitution is a BS crime and a waste of their time. I never told John why I did what I did, of course, and he probably did judge me, but for that night during the drive, we were not driver and escort. We were just John and Ashley.

Later that evening I told Henri that he had a wonderful driver and that I thought he was very kind. "Kind?" he asked. "What do you mean, kind? How would you know that? Did he talk to you?" I froze. A stream of thoughts and scenarios went through my head. Why was he so upset? All of a sudden I was nervous for John and his job, so I quickly said, "No, of course not. He is just a very good driver and always makes sure I know how far away we are from you when you are not with me in the car. You know how much I can't stand to be away from you and wait all by myself in the backseat." I put on my pouty face and coozied up to him so as to reassure him that there was nothing to worry about. Henri could be the biggest baby. After that, he refused to go out for the evening, so we stayed in, even though he had made special dinner plans with clients. He called his secretary at home and screamed at her to call them all and cancel. This was going to be a long night, and I was going to have my work cut out for me. Tonight wasn't about me. Tonight I had made a mistake, and it was talking to the driver and telling Henri. Now, I had to make him forget about it. It was time to "flip the switch," go into high gear, and make sure John didn't lose his job.

The next time John picked me up, I said hello to him with a smile you couldn't miss. He didn't respond. We rode in absolute silence all the way from downtown to a riverside skyscraper where Henri had an apartment so high up, you couldn't get cell

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"Could you guys even hear me?" I screeched. "I was trying to talk and tell you where I was!"

"No, we couldn't hear anything," said one techie, his headphones resting on his shoulders. "All of a sudden you were gone. We kept looking for you until we found you."

Fantastic, I thought. I could have been in serious danger in a car on its way out of town and these guys would not know how to find me.

"We would have found you with your transmitter eventually," said one cop.

"Eventually?" I yelled. "That's great. So as long as you can find my body *eventually*, I'm feeling better about the situation."

My anger did not subside as we headed back downtown to Corruption headquarters. I had a few choice words for the ADA in the debriefing.

Three days later, I got a bill from Jonas in the mail. He was probably mad that we hadn't had any sex after he'd done me such a big favor by setting me up at the bank.

Two days after that, on March 21, 2010, Jonas was arrested.

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rebecca kade

They wanted me to wear a wire with the lawyer who seemed to have a special place in Anna's life. I'll call him Donald.

It was he who had advised her on investing in real estate. He introduced her to some of her richest clients.

For the lawyer's efforts, Anna gave him his choice of her girls. He chose me. I was the payoff. I had about six sessions like this over time.

The investigators in the Corruption Unit got very excited when they heard that this lawyer was my client. Apparently somebody else had tipped them off about him. I'm guessing Jonas was blabbing like Chatty Cathy after his arrest. Known as "John Doe" during the legal proceedings, Jonas was to testify before Judge Juan Merchan more than a dozen times. So investigators had their eye on this attorney. But they were going to have the same problem with him as with Jonas: his hands were going to be all over me if we had a scheduled liaison.

And then something incredible happened. Anna returned from Canada and wanted me to come to the East Seventy-Eighth Street place to meet and then go eat lunch. She said she wanted to discuss the business. Lately we had been discussing on the phone about her starting up new websites for a match-making site. It seemed harmless, and the ADA and detectives were thrilled at the opportunity to have me meet her face-to-face while wearing a wire. I was chilled with fright. But then I thought, *Maybe this is straight-up: she's paranoid and probably wants to get back out of town, so this will be a quick lunch.* Maybe she wanted me to manage some of the day-to-day tasks of operating the business—for a bigger stake and at increased risk, but I highly doubted this. I agreed to meet her the following week. What choice did I have?

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EIGHTEEN

## wearing a wire with the madam

I had admitted to prosecutors months before that Anna Gristina had procured me to perform sex acts in exchange for money—a lot of money—from men. I had lured Anna's moneyman, Jonas Gayer, into a meeting with the Russian money launderers. The DA's investigators had even taped it. I had gotten Jonas to show me her accounts, and I recorded him explaining how she hid her money, possibly as much as \$14 million. Surely they now had enough evidence to arrest and convict Anna Gristina, if they were competent enough. I wanted to get my life back. But the prosecutors only wanted more.

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call girl confidential

This time the techies wanted me to wear the wire. "The audio from the recorder buried in the purse is simply not as good," said the lead detective. "We can't take any chances on this one, with both of them in the room talking."

On the appointed day, I was picked up and brought to Corruption. The DA's techies wired me up. The team drove me uptown in the surveillance van to East Seventy-Seventh Street, and I hopped out and walked the rest of the way to the apartment, where I thought only Anna was waiting for me. The detectives were in the van and in a couple of places out on East Seventy-Eighth. They had decided it was too risky to go inside. I don't know why it only occurred to me just as I was entering the building, but I realized that if things backfired and Anna wanted to hurt me, the cops wouldn't be able to get to me in time. I was on my own there.

I walked into the building and up the stairs to Anna's apartment, using my own key to enter. When I opened the door, I was stunned to see Anna sitting side by side with her attorney, Donald. He wasn't supposed to be there, and he most certainly would not go out in public with us to have lunch. He was rarely seen in public anywhere. I struggled to hold myself together and also listen to her. In my panic, my heart was racing, and I struggled to focus. I was Rebecca, then Ashley—no, wait, I was undercover Rebecca . . . no, I was absolutely confused . . . and then I snapped into place. I had a job to do. This is why the DA's office had me working for so long. I may have struggled internally, but in a mere moment I could completely pull off the performance of a lifetime and no one in that room had a clue I was scared or nervous. Not even the slightest suspicion.

Anna chatted amiably, but nothing concrete came up at first.

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I tried to steer the conversation towards the business, but she was having none of it. It soon became clear what she wanted.

"Ashley, darling, Donald has been missing you *so much*," she said, practically cooing as he grinned. "He's been so nice to us, and I would like you to make him feel good today."

Anna wanted me to have a session with Donald right then! Maybe he had done her a real estate favor last week, maybe he was just horny, but it was payback time, and the reward was to be me. Donald sat there grinning.

Oh, God! I had wires running up to my breasts! I had a device on! I was dead! My mind raced. Should I tell them I was having my period? That I felt the flu coming on?

"Oh, Donald, there's *nothing* I'd love to do more," I said, reaching over and running my hand up his thigh. "But I have to go pick up Isabella early from school for her doctor's appointment." Donald was one of the few clients who knew I had a daughter.

"Can't her nanny do that?" Anna practically spit out.

"I *always* accompany her to her pediatrician, Anna, as I'm sure you do with your children," I said as I slowly started to rise and back out towards the door. "Let's set up a time so I can give you the proper attention you deserve."

"It doesn't have to be a long marathon," Donald pleaded in a last-ditch effort to get me to stay.

I unlocked the door, and they started to rise as Anna said, "Ashley, wait!"

I just yelled, "Gotta go!" from the hallway and I noticed my voice sounded unnaturally high.

All I could think about was getting to that van and getting that wire off, going downtown, being debriefed, and being taken

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rebecca kade

I couldn't even speak with my sister about what the DA was putting me through. I had to think for myself. And I decided that I was done with this. I didn't want any part of this any longer. There had been too many close calls. The more I gave the prosecutors, the more they wanted. They did not seem to care about me at all.

One day the detectives brought me down to Corruption and into the ADA's conference room, and the ADA started to say, "OK, next we want you to . . ." There was something presumptuous about his tone. He didn't ask me. He was telling me. I had been doing this for about two years now, and I had had enough.

I said "No" before he had even finished.

"What do you mean, 'No'?" he asked, startled. The other ADA and the investigators fairly whipped their heads in his direction.

"I think I need an attorney and I need protection," I said. "I've never been charged with anything, and you've been putting me into risky situations, including during client sessions, for too long."

The ADA stared at me, and his face was turning red. His visions of being the golden boy who brought down Manhattan's biggest madam were evaporating because I was going to lawyer up. Perhaps he should have treated me better.

"You can hire one," he blurted out.

"No, I have a right to a public defender," I said, looking him right in the eye. "And you're going to get me one."

He stormed out of the room and, for all I know, out of the Manhattan district attorney's office. I never heard from him again, and now he is working as an assistant U.S. attorney. I wish them luck with that cowboy.

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home. I could barely breathe. This time was different. I knew if Anna and Donald had realized what I had been doing—well, I couldn't think about what would have happened. All I knew was that no one, no matter what they said, could have gotten to me quickly enough inside that apartment.

The investigators offered to drive me home, but I insisted on going alone. I had to get out of there and away from them. I called my sister as soon as I turned the corner.

"Hey. It's Rebecca."

"I know. How are you doing? How is Isabella?" she asked.

"She's fine, but I'm not doing too well. I wish I could come down there."

Bridget was silent.

"I just want this all to end."

"Rebecca, what did you think would happen when you got yourself wrapped up in that business?"

"I know, I know. I was just doing it for Isabella . . ."

"Remember the song, 'It's a long old road, but I'm gonna find the end.'"

"I hope so, Bridget. I . . . I just wanted to hear your voice. I needed to hear it. Tell me I'm going to be OK. I'm so scared."

"You are going to be OK. You are strong. And Isabella needs you. You told the truth, and that's all that matters. Be proud of that. OK? Keep me apprised of your situation. I need to know you are safe. Maybe we'll see you at Christmas?"

"OK. Sounds good. I love you."

"I love you too. Give Isabella hugs and kisses."

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call girl confidential

I was still working for Anna as if nothing had happened. Unless somebody suddenly wanted to give me an investment banking job, there was no way I could make that kind of money for my fight, which raged on in Family Court. I continued to have supervised visits with my daughter. I could focus on school again, and my grades were improving. I was returning to normal. I felt I had gotten my life back.

And then, eleven months later, I received a call from the new ADA on the case. They had not given up on bringing Anna down. My whole feeling of well-being instantly collapsed. Why? Why were they doing this? Weren't there terrorists and murderers and Wall Street cheats to go after? What did Anna Gristina do, really? Facilitate paid sex between consenting adults? As they say in Nevada, where prostitution is legal: "If it doesn't scare the horses, who cares?"

The ADA told me I had to come back down to Corruption headquarters.

"I'm not coming in," I said, "until I have an attorney."

"No problem," he said. He soon arranged for the court to assign me a lawyer named Seema Iyer. Seema called me and we met in her office, where I sat and told her my entire story. She was flabbergasted. She knew the first ADA well, and couldn't believe how he had treated me.

She made big trouble and said I could bring a lawsuit against the city if I wanted to, because it was patently illegal for them to make me continue working in an illegal business. Not to mention hypocritical.

The new ADA said that all the work I did under the first ADA was thrown out, because it would be inadmissible in court. I was given all this information from my attorney, who had a

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conversation with him. I never went in to speak with him or meet him. My attorney completely shielded me from that office. It was a different experience from what I had gone through on my own prior to that. What's more, the new ADA told me that many documents were missing, including some of mine. I would have to start all over again, he said.

"In fact, Ms. Kade, we have evidence now to charge you on three different counts of prostitution and could do so at anytime," the ADA said. It was blackmail. I felt like he was trying to intimidate me into going back to work for them under these threats. I stood my ground.

"You could plead to a lesser charge," my lawyer told me.

"I'm not pleading to crap!" I yelled.

I had made copies of every letter, kept the statements of every fake bank account, saved every e-mail with instructions from the DA's office. (And still have them.) Not only that, but even as they were putting wires on me, I had been recording *them*. That's right: I had recorded the proceedings of every meeting and phone call on my little recorder. My job was done: if they'd messed up, they could find a new girl to risk her life for them. I would fight them, and my attorney was ready.

So they simply took her off my case. They assigned me a new public defender. It was all perfectly legal. And he happened to have worked in the DA's office prior to going into private practice. He didn't pursue any action against them, but the message had been sent. No one ever threatened me with charges again; in fact, I didn't hear from this ADA again.

NINETEEN

gristina goes down

On July 19, 2011, Anna was having lunch with a wealthy man she had recently met, along with Jaynie Mae Baker, an alluring toffee-haired thirty-year-old. Jaynie Mae had once donned a bikini and a studded stretch halter with choker collar as a World Wrestling Entertainment (WWE) Raw Diva Search finalist, telling judges she was a "saucy little sushi roll." She was pretty and slender enough to work for Anna as an escort, but she didn't, as far as I knew. I never worked with her, anyway.

Jaynie Mae had a wealthy boyfriend, Wall Street investment banker Marcus Laun. And she had seen how much money there was to be made with a business like VIP Life, where she

E X H I B I T     F



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E-MAIL: GHARDYESQ@AOL.COM

October 8, 2014

Nassau County Bar Association  
Committee on Grievances  
15<sup>th</sup> and West Streets  
Mineola, NY 11501

RE: Hardy-Corley  
File #: N-1902-14

Dear Sir/Madam:

The following is a brief case history:

On January 26, 2012, I was "Assigned Counsel Arraignment Attorney" and was assigned by the Honorable Abraham Clott of the New York City Criminal Court to represent Mr. Corley on his criminal matter.

On February 15, 2012, Mr. Corley was arraigned his indictment, 423/12. He was charged with two counts of Promoting Prostitution as "D" felonies. At the arraignment, I was able to convince Judge Bonnie Wittner to reduce the bail from \$200,000.00 cash/\$150,000.00 bond to \$50,000.00 cash/\$25,000.00 bond. The matter was then adjourned for motions. An Omnibus Motion was thereafter filed.

After meeting with Mr. Corley, at the jail on February 9, March 14, and March 29 and after reviewing additional discovery, it was agreed that an investigator be utilized. An exparte motion for an investigator was granted, and Regent Investigations, an approved "18B" investigator, whom I used in the past, was hired.

At the same time, I was able to negotiate a plea bargain that would involve the minimum sentence of 1-3 years incarceration upon a plea of guilty. Mr. Corley was not interested in that disposition.

On April 10, the court issued a decision, and the matter was set for trial. Mr. Corley declined the above offer.

The matter was adjourned several times into the fall due to conflicting schedules between defense counsel, the District Attorney and the Court. However, the discovery

process and review of the case was on going, as was the investigation by Regent. Unfortunately, the investigation by Regent Investigations yielded no results.

In December, the court granted a new investigator, Mr. Mike Barry, also approved for work by the New York City Assigned Counsel. Mr. Barry and I had worked together in the past as well and I was familiar with his work. He too could find no information to assist Mr. Corley in his defense. Also during December, a motion was filed to have Mr. Corley released prior to trial based on speedy trial issues. That motion was denied.

By early December, the DA indicated the United States' Attorney's Office was interested in the case and if a plea was not taken shortly, the United States would pick up the case.

On December 18, 2012, I was able to secure a "reverse proffer" for Mr. Corley in which the United States prosecutors agreed to show Mr. Corley their evidence in order to convince him to take a plea in State Court as opposed to facing their case in Federal Court. After several hours, Mr. Corley decided he wanted to go to Federal Court. On December 20, the matter was adjourned, and on January 24, 2013, he was indicted in the Southern District of New York, and a new attorney was assigned to represent him on that matter. The State case was dismissed.

Response to Mr. Corley's allegations:

I deny Mr. Corley's allegations that I used his case for promotion. On December 3, when questioned by Mario Diaz, the reporter in the interview, I told him "These are baseless allegations against an innocent man and we will take the case to trial." And when questioned regarding the similarity to the high profile case going on at the same time of Anna Gristina, who was also charged with promoting prostitution, I replied "He is not accepting any deals, no reason he should, he is innocent." I have included a transcript of the interview. Moreover, when questioned, I saw this an opportunity to inform the public of Mr. Corley's position and help, as opposed to only hearing the prosecutor's version.

According to the article, the information is from the Vice Enforcement Division and District Attorney's office. It is information from the criminal complaint itself that is obtainable from the court file, which was not sealed.

At no point did I reveal any confidential information provided to me from Mr. Corley or Mr. Barry, the investigator.

As to his assertion that I was "back in the news discussing a similar case," on December 16, 2013, two weeks after Mr. Corley's interview, I was assigned a matter in which my client, Anthony Rodriguez, was allegedly a pimp who branded his women. On December 19, in response to those allegations, I said "It's alleged in the criminal complaint, however, in my discussions with him there is no basis for that whatsoever," There was no connection with Mr. Corley, moreover, Mr. Barry was not involved in this matter.

Should you require any additional information, please do not hesitate to contact me.

Sincerely,

Glenn E. Hardy

E X H I B I T   G

NOV/13/2013/WED 11:32 AM PORTS &amp; FILES

FAX No. 2124820575

P. 002

**NYC ASSIGNED COUNSEL PLAN - EXPERT VOUCHER FOR 722-c SERVICES IN  
CRIMINAL COURT AND SUPREME COURT CRIMINAL TERM**

ROYCE CORLEY

Name of Defendant

0423/2012

Indictment Number

1/10/13

Date of Order Authorizing Service

All Docket Numbers:

PORTS &amp; FILES

Name of Payee

INVESTIGATIONS

Area of Expertise

MICHAEL BARRY

Name of Expert if Different from Payee

NEW YORK SUPREME COURT

County and Court of Service

GLENN F. HARDY

, ESQ

Attorney Assigned to Case with Expert

HON. J. B. WITTNER

Judge/Referee/JHO/Magistrate

58-2482999

Social Security #

-or-

Tax Payer ID#

30 VESBY STREET - SUITE 1803

Payee Street Address (No PO Boxes Accepted)

NEW YORK

NY

10007

City

State

Zip Code

212 482 0200

Telephone

A. TOTAL HOURS BILLED 18.5 AT \$ 50.00 PER HOURLY RATE = \$ 925.00

B. ITEMIZED EXPENSES (RECEIPTS MUST BE ATTACHED; ATTACH ADDITIONAL SHEET IF NECESSARY)

(1) \$ (3) \$

(2) \$ (4) \$

TOTAL EXPENSES \$

TOTAL AMOUNT OF VOUCHER (SUM OF A &amp; B) = \$ 925.00

HAS EXPERT COMPENSATION AND/OR REIMBURSEMENT FOR THIS INDICTMENT/DOCKET(S) PREVIOUSLY BEEN  
APPLIED FOR OR RECEIVED?

? YES ? NO IF YES, SPECIFY AMOUNT AND CIRCUMSTANCES:

DATE AMOUNT REASON FOR PAYMENT

THE ABOVE INFORMATION IS CERTIFIED TO BE CORRECT.

EXPERT SIGNATURE

ATTORNEY AFFIRMATION

I GLENN F. HARDY

(print name) certify, pursuant to the penalties of perjury, that

the above-named expert was duly appointed to this case by order dated 1/10/13. I further certify that I utilized the  
services of this expert in conjunction with my legal representation of the above-named defendant and the work product and  
services described in the voucher and accompanying worksheet are consistent with my understanding of the services  
conducted by this expert.

Attorney Signature:

Date

## EXPERT COMPUTATION

\$ RATE 50.00 x 18.5 HOURS = \$ 925.00

EXPENSES + \$ 0

TOTAL = \$ 925.00

## FOR COURT USE ONLY:

\$ RATE x HOURS = \$

EXPENSES + \$

TOTAL = \$

? APPROVED AS SUBMITTED ? ADJUSTED

JUDICIAL SIGNATURE/STAMP

DATE

PT 61 DEC 06 2013

ANY VOUCHER EXCEEDING THE STATUTORY \$1,000 CAP MUST INCLUDE AN AFFIDAVIT OF EXPLANATION  
THIS VOUCHER SUBMISSION MUST INCLUDE THE ORDER, WORKSHEET AND ANY EXPENSE RECEIPTS  
VOUCHER MUST BE SUBMITTED WITHIN 45 DAYS OF FINAL DISPOSITION OR DATE ATTY RELIEVED FROM CASE

Assigned Counsel Plan 253 Broadway, 2<sup>nd</sup> Floor, New York, New York, 10007

ACP 12/07

PLEASE RETAIN A COPY FOR YOUR RECORDS

F134

JAN 13 2014

ASSIGNED COUNSEL PLAN  
EXPERT CASE WORKSHEET (12/07)

Defendant's Name <b>ROYCE CORLEY</b>	Expert <b>PORTS &amp; FILES</b>	PID <b>58-2482999</b>
Indct/Docket No.: <b>0423/2012</b>	Date Assigned <b>1/10/13</b>	
Charge <b>P.L. 230.25</b>	Telephone Number <b>212 482 0200</b>	

ACTIVITY LOG

<i>DATE</i>	<i>LOCATION</i>	<i>START TIME</i>	<i>FINISH TIME</i>	<i>NUMBER OF HOURS</i>	<i>DESCRIPTION OF ACTIVITY</i>
11/21/12	NEW YORK	8:00AM	4:00PM	8	RESEARCH NEW FILE DOCUMENTS
12/01/12	NEW YORK	11:00AM	1:00PM	2	ATTEMPT TO LOCATE POSSIBLE WITNESSES; REVIEW FILE DOCUMENTS
12/02/12	NEW YORK	12:00AM	3:00PM	3	INTERVIEW WITNESS, DEFENDANT; REVIEW RECORDS
12/03/13	NEW YORK	7:00PM	11:00PM	4	CALL POSSIBLE WITNESS; VERIFY DEFENDANT'S STORY; REVIEW FILE DOCUMENTS; RESEARCH
4/16/13	NEW YORK	10:00AM	11:30PM	1.5	REVIEW FILE DOCUMENTS/FINAL REPORT

**TOTAL # OF HOURS 18.5**

Assigned Counsel Plan 253 Broadway, 2nd Floor, New York, New York, 10007  
ACP 12/07 PLEASE RETAIN A COPY FOR YOUR RECORDS

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK NEW YORK

-----X  
THE PEOPLE OF THE STATE OF NEW YORK

Indictment No.: 423/2012

Docket No.: \_\_\_\_\_

-against-

ORDER AUTHORIZING SERVICES  
OTHER THAN COUNSEL UNDER  
ARTICLE 18-B OF THE COUNTY  
LAW, SECTION 722-c

ROYCE CORLEY

Defendant.

-----X  
Upon reading the Affirmation of GLENN F. HARDY, ESQ., counsel for the above-referenced defendant, setting forth the justification for the appointment of Michael Barry (expert or other professional) whose curriculum vitae was provided to the court and who was requested to provide investigative services, and the Court being satisfied that the defendant is financially unable to obtain investigative, expert or other services necessary to an adequate presentation of (his)(her) case, it is hereby

ORDERED, that counsel is authorized to obtain the necessary and reasonable and services of Michael Barry/Ports & Files for the hourly rate of \$50.00 in accordance with Article 18-B, Section 722-c of the County Law.

And IT IS FURTHER ORDERED that upon rendition of such services, counsel shall be authorized to present to the Court a claim for compensation not to exceed the statutory cap of \$1,000, at which time the Court will determine reasonable compensation for the services rendered and direct the City of New York to pay such amount to the expert/professional or to such other person entitled to that compensation. If any such claim for compensation exceeds the statutory cap of \$ 1,000, counsel must submit an affirmation detailing the extraordinary circumstances requiring work in excess of the cap.

NUNC PRO TUNC

11/7/12

  
Judicial Signature/Stamp

Hon. B. Wittner

Dated: \_\_\_\_\_ 20

PT. 61 JAN 10 2013

SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK  
vs.ROCYCE CORLEY  
DEFENDANT230.25  
TOP CHARGE423/12  
INDICTMENT NUMBER

DOCKET NUMBER

1. I, GLENN F. HARDY am duly licensed to practice law in the State of New York, and hereby affirm, under penalty of perjury, that the following is true:
2. By order of this Court dated Jan. 26, 2012, I was assigned to the above-referenced case.
3. The above-referenced defendant is financially unable to obtain investigative, expert or other services necessary to an adequate presentation of his case.
4. For the following reasons, services other than counsel are necessary on behalf of the above-referenced defendant.

**Justification for appointment of expert and anticipated work to be performed:**  
To speak with and interview witnesses

5. It is requested that services be rendered by the expert indicated) and it is further requested that the Court set a reasonable compensation rate. In setting a reasonable compensation rate, the Court may be guided by the attached payment guidelines set forth in the Administrative Order of the Chief Administrator of the Courts.

Ports &amp; Files, Inc.

Interview complainant/ witnesses

NAME

NATURE OF SERVICES

80 Wall Street # 1017  
New York, NY 10005-3615 (718)-267-2124, fax: 212-482-0575  
STREET ADDRESS

WHEREFORE, I respectfully request that the Court authorize the necessary and reasonable services of Regent Investigations (name of expert), in accordance with Article 18-B, Section 722-c of the County Law.

AND upon rendition of such services, I shall be authorized to present to the Court a claim for compensation not to exceed the statutory cap of \$1,000, at which time the Court will determine reasonable compensation for the services rendered and direct the City of New York to pay such amount to the expert/professional or to such other person entitled to that compensation. Payment of fees exceeding the \$1,000 cap will be contingent upon receipt of an affirmation detailing the extraordinary circumstances requiring work in excess of the cap.

Dated this 23 day of Oct. 2012.

Signature:

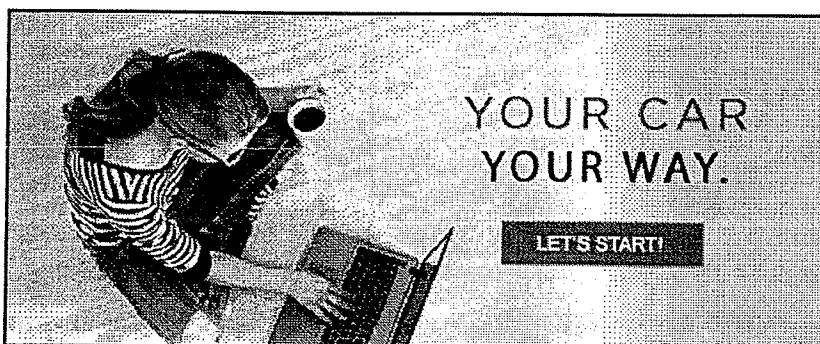
Print Name:

Glenn F. Hardy

Address: 226 7<sup>th</sup> St., ste. 302, Garden City, NY 11530



**EXHIBIT H-1**



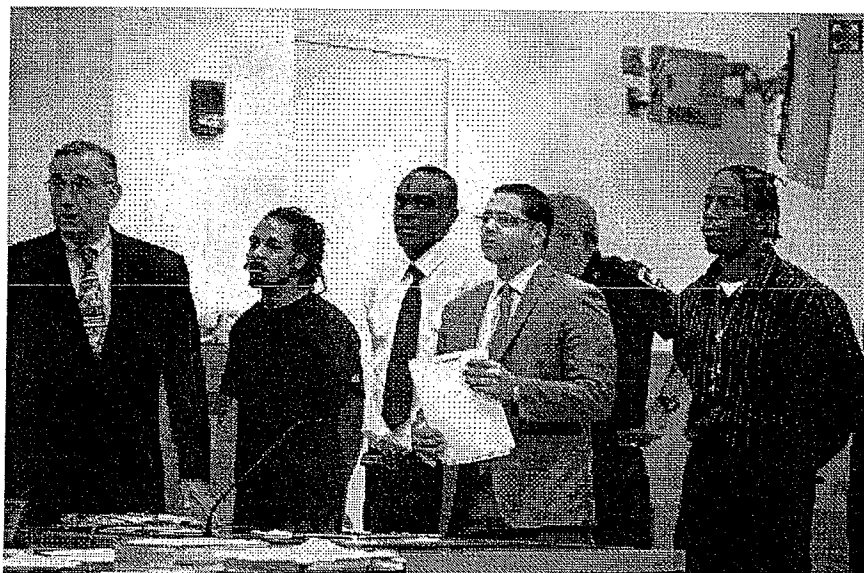
**Paragon**  
**DIRECT**  
 DIRECT PRICING. DIRECT DELIVERY.

## Lawyer: Brooklyn district attorney's office dropping problem-plagued case of four men charged in rape of Orthodox Jewish woman

Four accused of accused of pimping out Crown Heights woman when she was 13 years old and enslaving her with threats and violence

BY OREN YANIV, TRACY CONNOR / NEW YORK DAILY NEWS / Thursday, June 21, 2012, 1:19 AM

A A A



JESSE WARD FOR NEW YORK DAILY NEWS

Jamali Brockett (second from l.), Darrell Dula (third from l.) and Damien Crooks (r.), along with Jawara Brockett (not pictured) are off the hook in a crumbling rape case, defense attorney James Phillips said.

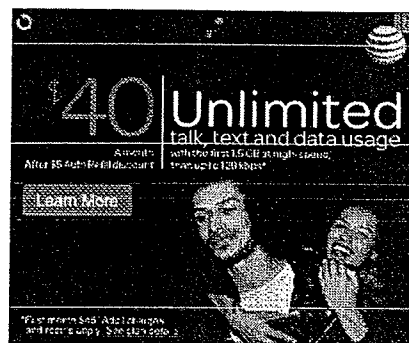
Brooklyn prosecutors are dropping the problem-plagued case against four young men charged in the alleged rape and sex-trafficking of an Orthodox Jewish woman, who recanted at one point, a defense lawyer said Wednesday.

James Phillips, who represents one of the accused, said the assistant district attorney on the case told him the indictment will be dismissed at a hearing Tuesday.

"He was relieved, obviously, and pleased," Phillips said of his client, Darrell Dula, 25, who was freed on bail after the case began to crumble. "But it's a bittersweet result. He spent nearly a year in jail on a crime he didn't commit."

A spokesman for Brooklyn DA Charles Hynes did not return a call.

Phillips said he believed Hynes is abandoning the case so he doesn't have to confront embarrassing allegations of misconduct.



### EDITOR'S PICKS

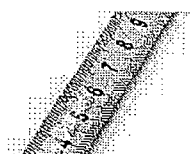
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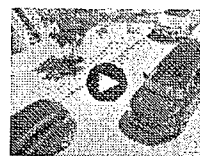


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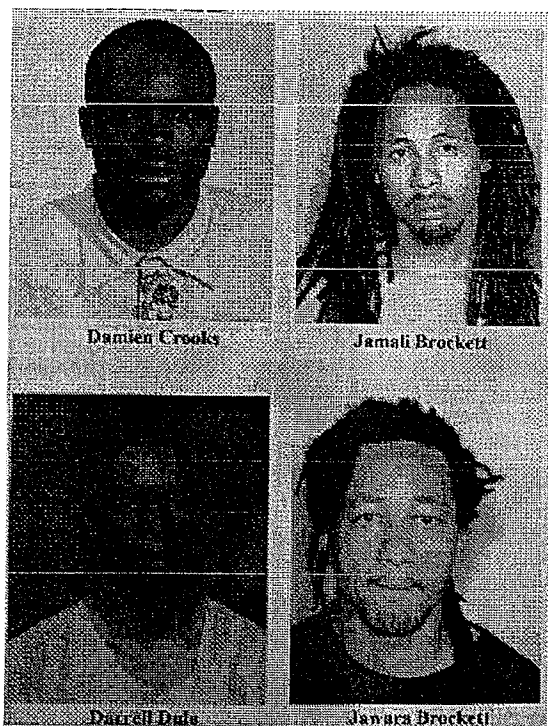
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Dula, Damien Crooks, 32, and brothers Jamali and Jawara Brockett were accused of pimping out the 22-year-old Crown Heights woman when she was just 13 years old, enslaving her with threats and violence.

A day after she filed her original complaint, the woman briefly recanted and said she had a consensual relationship with Crooks — a fact that was withheld from the defense for months.

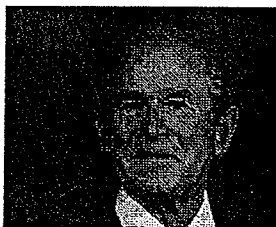
The woman's father recently said she hoped to return from self-defense training in Israel to testify against the men at trial. "The worst possible outcome would be for it to be thrown out on a technicality," he said.

The original prosecutor on the case told the Daily News she had brought misgivings about the accuser's credibility to her boss and was brushed off. Both assistant DAs have since left Hynes' office.



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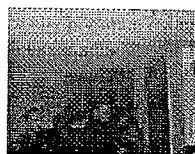
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E X H I B I T   H-2

## FIRST ON PIX: Alleged pimp brands his prostitutes with tattoos (and by day he's also a tour bus operator)

POSTED 4:58 PM, DECEMBER 19, 2012, BY ROLANDO PUJOL AND MARIO DIAZ. UPDATED AT 07:20PM, DECEMBER 19, 2012



**Alleged pimp brands his prostitutes; forces them to get tattoos**

WPIX - New York



(NEW YORK) – A tattoo is an expression. A form of art for many. This said, PIX 11 News has learned that prosecutors inside of Manhattan Supreme Court on Thursday will say that alleged pimp Anthony Rodriguez used tattoos as a way to brand his women.

The tattoos allegedly forced on them was the way the 26-year-old operated on the streets. It was a stark reminder to the women as well as a warning to others that this was his property.

"Apparently this is a common situation where pimps where will tattoo their women to show that these women are their property," said his defense attorney Glenn Hardy.

If there is anyone who understands how to move flesh, it's allegedly Rodriguez. When he's not allegedly running street walkers, he's apparently running tourists around the city as a bus dispatcher for a tour operator.



PIX 11 News has learned that prosecutors inside of Manhattan Supreme Court on Thursday will say that alleged pimp Anthony Rodriguez used tattoos as a way to brand his women.

"He was employed with a tour company that runs the buses in midtown, you know, touring the city," said Hardy.

The criminal complaint by a detective out of the NYPD's Vice Enforcement Division says that Rodriguez, who was arrested last Friday, was the architect behind a prostitution ring that operated on websites and included the trafficking of a prostitute to an international jurisdiction.



"It's alleged in the criminal complaint, however, in my discussions with him there is no basis for that whatsoever," said Hardy.

The operation, which lasted more than two years, appears to also have been violent. Rodriguez allegedly beat two women, one at a location on Manhattan Street in Harlem. The other blocks away at a residence on Lexington. The reason? There are two of them. Either they did not share all of the profits for hooking or they refused to deliver sexual favors to Rodriguez when he called for them.

However, it's the hard core act of branding his women that makes this case unique. Or does it?

PIX 11 News spoke with a tattoo artist along St. Mark's Place whose been coloring for 18 years. Kris didn't want to go on camera, but he did indicate that pimps marking their hookers is not uncommon.

"At all the tattoo shops I used to work at, yes, people come in telling I want my name on her and that's it. It's what they force and demand, that's it."

Rodriguez, faces charges of criminal sex acts, promoting prostitution, sex trafficking, possession of a weapon, as well as endangering the welfare of a child.

There are also two interesting coincidences involved in this case. The arresting detective is a female who also played a key role in exposing a father-son prostitution operation centralized around livery cars in the spring. Separately, Hardy also is the defense attorney for Royce Corley. He made headlines recently for a January arrest where he allegedly utilized Con Edison computers to promote prostitution while on the job.

E X H I B I T    I



**SHAINA FOSTER**

Tied up, robbed geezer.

## Sex-trap twin gets slammer

A teen who with her twin sister tied up and robbed an elderly Manhattan man she met on a sugar-daddy Web site was sentenced to five years in prison Thursday.

Shaina Foster, 18, was denied youthful-offender status, which would have sealed her criminal record, by Manhattan Supreme Court Justice Michael Obus.

"This is a case in which far worse results could have happened if the victim had not been rescued," he said.

Foster, who hatched the plan and brought sister Shalaine, copped to robbery in the second degree in June.

She met Paul Aronson, now 85, on SeekingArrangement, a site that pairs rich men with young women, and brought Shalaine to their date on Oct. 1, 2014.

The three went to his East 38th Street town house, where the twins tied him to a coffee table and took his credit cards and \$500.

Shalaine copped to robbery and was sentenced in May to 1 $\frac{1}{3}$  to four years in prison. *Rebecca Rosenberg*



E X H I B I T J-1

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## OPINION

# New York Must Strengthen Sex Trafficking Laws

by Cyrus Vance, Jr., Jan 28, 2015

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Manhattan DA Cy Vance (photo: DA's office)



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Sex trafficking is a lucrative criminal enterprise in which youthful looks are in high demand and actual children command top dollar. Yet, gaps in New York State's sex trafficking laws limit prosecutors' ability to convict traffickers of high-level felonies, making sex trafficking of children in New York a relatively low-risk proposition.

Forty-six states in this country recognize that prostituted children are victims of sex trafficking. These states acknowledge that vulnerable children innately deserve the strongest protection, and their laws enable prosecutors to seek tougher convictions and prison sentences for those who traffic minors. Currently, New York is not one of those states.

Traffickers are not merely common criminals, but often calculating heads of criminal enterprises that rake in thousands of dollars over the course of months – or even years – before their rings are dismantled. They know that Sex Trafficking is often difficult to prove, given the unwillingness of victims to testify against their abusers due to the trauma they have suffered, fear of retribution, and the complex psychological bonds many have developed.

In New York State, Sex Trafficking convictions require proof of force, fraud, or coercion, even if the victim is under 18. According to data compiled (<http://www.polarisproject.org/what-we-do/policy-advocacy/national-policy/state-ratings-on-human-trafficking-laws>) by the Polaris Project, New York is one of only four states where that is the case. That means, for instance, if New Jersey prosecutors prove that a defendant sold a sixteen-year-old girl for sex, that defendant would be convicted of Sex Trafficking – but in New York, prosecutors would additionally have to prove that the defendant used fear, fraud, or coercion to compel that teenager into trafficking. New York's laws are similarly weaker than the federal and international definitions of sex trafficking. That must change.

As national Human Trafficking Prevention Month draws to a close, I am calling on New York State legislators to give our prosecutors the same tools, allowing us to better protect the children traffickers target for sexual exploitation and profit. The penal code must be changed to recognize the fact that children do not have the legal, psychological, or emotional capacity to consent to sexual activity, as reflected in our statutory rape laws. This view of children should not change simply because there is an exchange of money.

Of course, New York takes trafficking very seriously. Recently announced state legislative initiatives include many significant proposals, such as changing Sex Trafficking from a nonviolent to a violent felony, and offering more support and

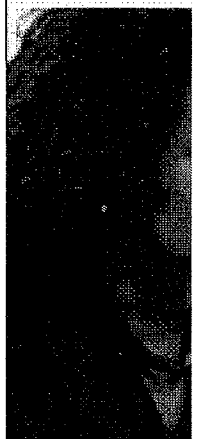
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services for victims. But there is a gaping hole in our State's laws governing the trafficking of children – one that would be simple to correct. We need to amend our penal code so that Sex Trafficking can be proved *without* evidence of force, fraud, or coercion when the victim is less than 18 years of age.

Law enforcement in jurisdictions that have this proposed statute, such as New Jersey and our counterparts in the Southern District of New York, are better able to secure high-level felony convictions and correspondingly lengthy sentences of traffickers. In contrast, New York State prosecutors have occasionally found that the only way we can bring a trafficker to justice is to seek prosecution in another jurisdiction.

Let me give you an example. Royce Corley, who also went by the name "Ron Iron," ran a prostitution ring in Manhattan in 2011 and 2012 that included underage girls. He photographed the children – including three 16-year-olds – in explicit poses, advertised them on backpage.com, and made thousands of dollars by selling them for sexual services. Working with our partners in the NYPD, Corley was arrested after an undercover sting.

Despite the fact that Corley was prostituting children, my office's Human Trafficking prosecutors were unable to charge the defendant with Sex Trafficking under current New York State law. So, we asked the Southern District of New York to take the case, and to seek appropriate justice where we could not. Following his trial conviction under Federal sex trafficking statutes, Corley was sentenced to 10 years in prison and 10 years of post-release supervision.

Prosecutors should not have to hand-off cases to ensure that victims in New York get justice. My proposal would not only ensure that offenders could be convicted of higher felonies and therefore receive stronger sentences, but would also ease the traumatic experience a victim may face if a case goes to trial.

Eliciting testimony about sexual conduct and force, fraud, or coercion is incredibly difficult for any victim, let alone a child. With the proposed changes, a child's testimony could essentially be boiled down to two questions: How old are you? And, were you prostituted by the defendant on trial?

At its core, this proposal is an acknowledgement that a child sold for sex is a victim, plain and simple. Let's follow in the footsteps of the overwhelming majority of other states, the federal government, and the international community. Let's ensure that those who profit from selling children will face consequences commensurate with their crimes. Let's do what is just for the most vulnerable among us.

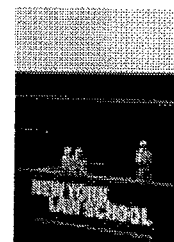
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Cyrus R. Vance, Jr. is the Manhattan District Attorney.

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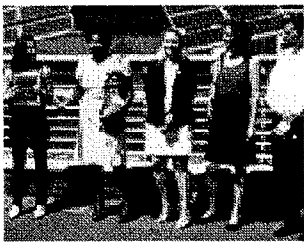
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E X H I B I T J-2



## Off easy if a vic won't talk

Isaiah Barnes, 27, was busted pimping out a 16-year-old girl in Queens — but was let off with a slap on the wrist thanks to the state's backward trafficking laws.

Cops collared Barnes in a January 2016 sting operation after he advertised the teen on Backpage.com and an undercover officer met the pair at a Comfort Inn, according to a criminal complaint.

But the girl — a runaway from Connecticut — wouldn't cooperate with prosecutors, even jumping out of a moving car to escape law enforcement.

Without her testimony, the Queens District Attorney's Office couldn't charge Barnes with sex trafficking of a minor — a Class B felony that

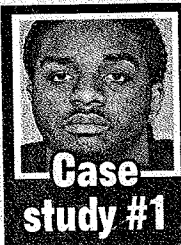
would've seen him sentenced to up to 25 years behind bars.

Instead, they had to settle with promoting prostitution of a minor — a Class D felony at the time, which allowed him to get off on probation.

That's now a Class C felony — but prosecutors say he should automatically have been charged with trafficking because his victim was too young to consent.

"If under 18 was included in the sex-trafficking statute, like it

should be, then he would have been facing up to 25 years — even without her testimony," says Queens Assistant District Attorney Jessica Melton, chief of the borough's Human Trafficking Unit. Yoav Gonen



Case study #1

## Feds forced to bail out DA

Royce "Iron Ron" Corley was arrested for selling underage girls in Manhattan — but the borough's district attorney was powerless to lock him up for trafficking.

Instead, he had to turn to federal prosecutors to make the case.

The 29-year-old Corley had taken in three 16-year-old runaways — giving them lodging and cellphones — and then advertised them for sex on Backpage.com, posting explicit photos of the teens in the classified ads.

The Manhattan District Attorney's Office and NYPD busted Corley in an undercover operation in 2011 but didn't have what was needed to prove the girls were forced,

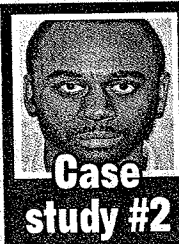
coerced or defrauded into prostitution under current state law.

Federal laws recognize that underage teens can't consent to sex, so DA Cyrus Vance Jr. handed the case off to then-US Attorney Preet Bharara.

Corley was sentenced to 10 years in prison for sex trafficking minors and possessing child pornography.

But prosecutors say it's no long-term solution: They can't force the feds to take a case, and it means the attorneys who know the case best are no longer involved.

"It just drives you crazy," Vance said of the current law. Yoav Gonen



Case study #2

# 'CUFFS' ON



By YOA V GONEN, SHAWN COHEN and RUTH BROWN

**P**ROSECUTING pimps who sell kids for sex may seem like an open-and-shut trafficking case — but not in New York.

Weak state laws, are keeping traffickers out of prison, and lawmakers are failing vulnerable kids by refusing to change them, prosecutors and cops told The Post.

New York is one of just three states — along with Alabama and Ohio — that requires attorneys to prove that an underage victim was forced, defrauded or coerced into prostitution to make a trafficking case, even though minors can't legally consent to sex with an adult.

As a result, dirtbags can pimp out 12-year-old girls on Craigslist and get off with a slap on the

wrist if the victims can't or won't testify.

"We can bring other charges — we can bring promoting prostitution charges — but if it's your first arrest and you're looking at one to three years on that charge, you can end up with probation for what is essentially child rape for profit," said Laura Edidin, chief of the Brooklyn District Attorney's Office's Human Trafficking Unit.

The state's unusually high burden of proof often means the only witnesses who can prove the children weren't willing participants are the victims themselves. And as survivors, advocates and law-enforcement officials have explained in The Post's three-part series on the scourge of sex trafficking in New York City, the victims often don't see themselves that way — or they're simply too trauma-

tized to take the stand.

"They don't recognize themselves as victims," said Inspector Jim Klein, head of the NYPD's Vice Enforcement Unit.

"They love their pimp. They're afraid that we can't protect them — that something bad's going to happen to them," he said. "It's hard. The DAs will tell you. The [assistant US attorneys] will tell you. It's difficult to get these victims to cooperate."

Some Albany lawmakers have been fighting an uphill battle in recent years to make prostitution of a minor a sex-trafficking charge — bringing it into line with the federal definition — but the bills have repeatedly failed to clear the Assembly.

Opponents in the past have said they're worried trafficking victims who help recruit other minors into "the life" will be prosecuted as well — but even a



# PROSECUTORS

**FIGHT GOES ON:** Laura Edidin (opposite page), of the Brooklyn DA's Human Trafficking Unit, is frustrated by legal obstacles — even as pimps are rounded up by NYPD Vice Unit boss Jim Klein, Capt. Thomas Milano, FBI Special Agent Thomas Thompson, Lt. Joseph Picarello and Lt. Christopher Sharpe (from left).

**POST INVESTIGATION:**

**Scourge  
of sex  
trafficking**



**AID:** Rachel Lloyd started Girls Educational & Mentoring Services (GEMS) to fight sex trafficking.

**Offering a  
way out of  
'the life'**

It usually starts with a phone call in the middle of the night. A young girl, distressed and desperate, is looking for someone to save her from her abusive pimp — even though just making the call has already put her life at risk.

Rachel Lloyd and her staffers are often on the other end of the line — the first stop in a lengthy, emotionally draining process of transitioning a sex-trafficking victim out of "the life."

Lloyd, the founder and executive director of Girls Educational & Mentoring Services, is a survivor herself, starting GEMS at her kitchen table when she was 23 — with just \$30 and a borrowed laptop.

"It's about giving young women those things that people can't take away: skill sets, education, certifications, whatever it is, so no matter what, you have something else to fall back on," Lloyd said of her work.

While there are government shelters for victims of such crimes as domestic violence, there is not one single taxpayer-funded bed in the city dedicated solely to trafficking survivors. So GEMS and other non-governmental organizations such as Covenant House and Sanctuary for Families try to help fill the gap.

Juanito Vargas of Safe Horizon said the work with survivors is "intense" at first — and it can take years to prepare them to fully integrate back into society.

"They can have housing and a job, but they'll still come to us because of the emotional stress the person continues to experience," he said.

Gabrielle Fonrouge  
and Shawn Cohen

## NY lawmakers hamper push to punish pimps

2017 bill that expressly prohibited that unintended consequence died in the notoriously progressive Codes Committee.

With trends toward decriminalization and reducing the overall prison population, beefing up felonies is a tough sell to lefty lawmakers, politicians say.

"We have a difference of minds about what that penalty should be," said Assemblywoman Amy Paulin (D-Westchester), who authored the 2017 bill and an earlier 2015 iteration. "I would argue that we need a higher penalty for traffickers."

Codes Committee Chair Joe Lentol (D-Brooklyn) said he supports the concept of the bill, but that's as far as he would go.

"It sounds like something we should do to protect children ... it's just that the devil's in the details," he said.

Assembly Speaker Carl Heastie

didn't respond to a request for comment. One member of the committee told The Post that top Codes staffers believe sex trafficking of minors is "already covered by other statutes."

But those who actually have to put the pimps behind bars say they don't go far enough.

"There's no question there's times there are cases we can't make because we can only prove force, fraud or coercion through the testimony of the victim and they're either in no condition to testify or their parent or guardian doesn't want them to testify," Edidin said.

Despite this roadblock, law-enforcement officials say the city has come a long way in tackling sex trafficking in recent years.

Last February, the NYPD said it had restructured its Vice Unit — adding 25 more detectives to focus on sex trafficking in the city with an emphasis on busting

johns and pimps rather than purported prostitutes.

Manhattan DA Cyrus Vance Jr. says his own evolution on the subject mirrors this cultural shift. He recalled the long line of women — handcuffed to one another — that often were led into court in the 1980s, when he was a young assistant in the DA's Office.

Now there's a courthouse in Midtown where all the prostitution cases are handled — and every case there is viewed as one of potential trafficking, he says.

"Our goal now is for working ... to make ourselves available to the men and women, to really try to understand who is being trafficked and by whom," Vance said. "So that's a complete 180 reversal on dealing with prostitution cases."

**Editorial / Page 26**

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■ **MY SISTERS' PLACE:  
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Matthew McDevitt



E X H I B I T J-3

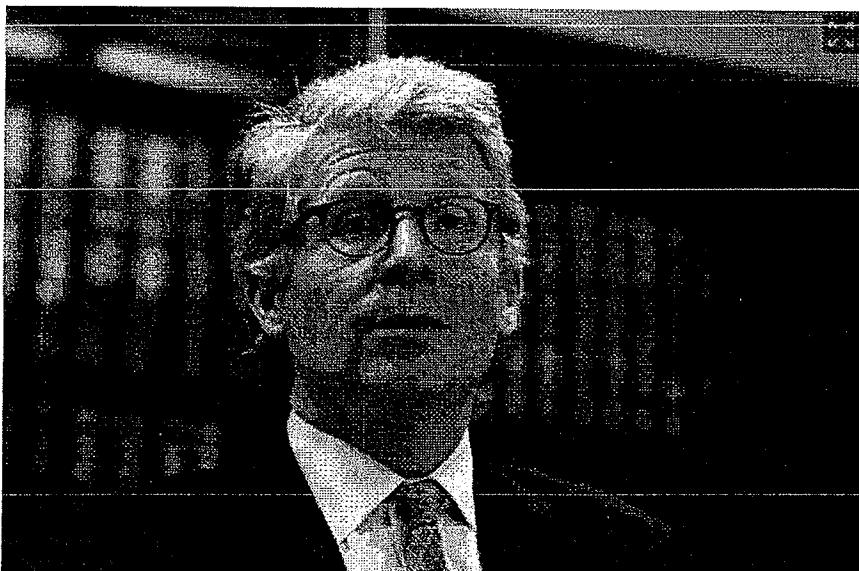
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## Pimp a less-fit dad than 3-year-old's hooker mom

Lamont Brunson of Harlem ends up in pen on sex-trafficking conviction after taking mom to Family Court and accusing her of being unfit because she was turning tricks. Mom then told cops that pimp forced her to work streets

BY JANON FISHER / NEW YORK DAILY NEWS / Wednesday, August 1, 2012, 11:16 PM

A A A



BRYAN SMITH FOR NEW YORK DAILY NEWS

Manhattan District Attorney Cyrus Vance's office came down on pimp Lamont Brunson after he took mother of his child to Family Court and called her unfit.

A HARLEM pimp who went to court to try to wrest his 3-year-old daughter away from her hooker mom will now be spending the next three to nine years in state prison for sex trafficking.

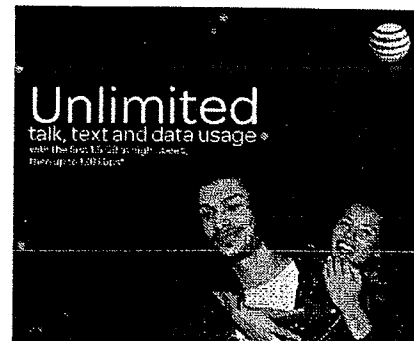
Thickheaded Lamont Brunson, 33, took his prostitute girlfriend to Family Court, claiming she was an unfit mother because she was turning tricks.

"He conveniently ignored his role in her exploitation," Assistant District Attorney John Temple told the judge at his sentencing Wednesday.

The woman, who is not named because she's a sex-crime victim, in turn went to the cops, telling them that he was forcing her into the flesh trade.

jfisher@nydailynews.com

### PROMOTED STORIES



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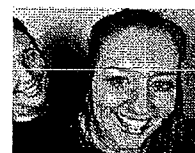
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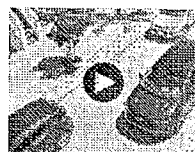


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Print



Cyrus R. Vance, Jr.  
 District Attorney, New York County

For Immediate Release

February 05, 2014

## DA VANCE: SEX TRAFFICKER SENTENCED TO 10 ⅓-TO-32 YEARS IN PRISON

*Taye Elleby Operated Prostitution Ring, Trafficked 17-Year-Old Girl Out Of Harlem Apartment*

Manhattan District Attorney Cyrus R. Vance, Jr., today announced the sentencing of TAYE ELLEBY, 36, to 10 ⅓-to-32 years in state prison for running a prostitution ring and trafficking a 17-year-old female victim into prostitution. On December 16, 2013, a jury in New York State Supreme Court found ELLEBY guilty of the top count of the indictment against him, Sex Trafficking, as well as two counts each of Promoting Prostitution in the Second and Third Degrees.

"Sex trafficking is a serious crime that leaves terrible scars on its victims," said District Attorney Vance. "But just like any other criminal enterprise out to make money, sex traffickers like Taye Elleby often leave digital footprints that are devastating proof of their crimes. My Office's human trafficking prosecutors are also cross-trained in financial investigations, and are working with financial institutions to flag suspicious banking behavior typical of sex traffickers. Using financial crime investigative techniques, we are not only able to build stronger cases, but better able to identify victims and get them the help they need."

As proven at trial, beginning in March 2013, ELLEBY ran a prostitution ring from his Harlem apartment involving a 17-year-old girl that he trafficked into prostitution. ELLEBY, who advertised commercial sexual services through the website Backpage.com, controlled the victim through physical, emotional, and psychological coercion, and demanded that she hand over nearly all of the money she made. If the victim did not follow his rules, ELLEBY physically assaulted her. In one incident, he did not allow her to eat when she had not earned enough money. He also used emotional manipulation, convincing the victim that he loved her, and that she loved him.

The defendant was arrested outside his home after the victim's mother contacted law enforcement. Prosecutors were able to connect scores of ads posted on Backpage.com to ELLEBY through various forms of forensic evidence which were presented at trial.

Last month, District Attorney Vance, in conjunction with Monique Villa, the CEO of the Thomson Reuters Foundation, issued a white paper that provided guidance to the financial industry on how to identify and report irregularities in financial transactions that might be linked to human trafficking activity. The document has been adopted by some of the world's leading financial institutions, including American Express, Bank of America, Citigroup, and JP Morgan Chase, and is the key outcome of the financial working group initiated last April.

Some of the suspicious financial behaviors identified in the document include the regular transfer of funds from the employees' accounts back to the employers (indicative of labor trafficking), recurrent business transactions taking

place outside the time of known business operations, international transfers of funds that are inconsistent with the stated business purpose of the customer, and a high number of individual accounts opened and closed simultaneously. The document also identifies a number of industries whose workers are more easily exploited by traffickers, including non-unionized service or hospitality providers, labor intermediaries, nail salons, travel agents, restaurants and strip clubs.

Assistant District Attorneys Siobhan Carty and Kristen Caruso handled the prosecution of this case, under the supervision of Assistant District Attorney John Temple, Attorney-in-Charge of the Human Trafficking Program, Assistant District Attorney Nicole Blumberg, Chief of the Child Abuse Unit, and Chief Assistant District Attorney Karen Friedman-Agnifilo. Trial Preparation Assistant Caitlin Barrett assisted with the case.

District Attorney Vance thanked NYPD Detective Mark Woods currently with the Joint Terrorism Task Force, formerly with the Vice Enforcement Division.

Defendant Information:

TAYE ELLEBY, D.O.B. 9/15/1977  
New York, NY

Convicted:

- \* Sex Trafficking, a class B felony, one count
- \* Promoting Prostitution in the Second Degree, a class C felony, two counts
- \* Promoting Prostitution in the Third Degree, a class D felony, two counts

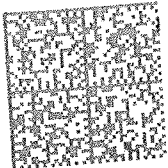
Sentenced:

- \* 10  $\frac{2}{3}$ -to-32 years in state prison



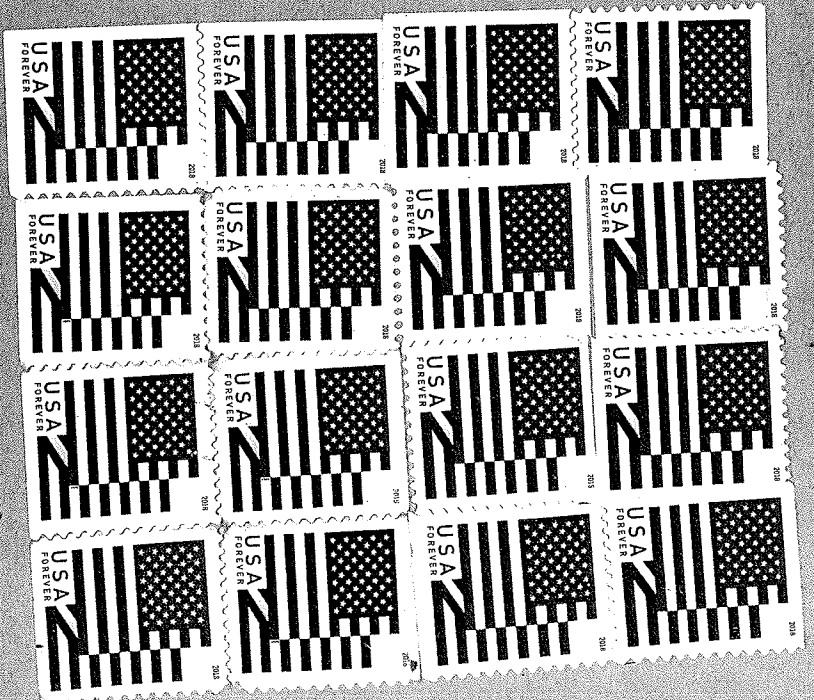
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